

Page 10-23, Table 10.K: The peak flows listed under location 9 in the table are different than the peak flows presented on Figure 10-3.

AA-126

Page 10-25, 3rd Paragraph: If it can't be verified until after the FEIR is completed that the changes proposed by the project would reduce floodplain impacts to a less than significant level, then it cannot be concluded in the EIR that they are less than significant.

AA-127

Page 10-30, 1<sup>st</sup> Paragraph: According to the EIR page 10-24, the amount of impervious area would only be reduced by one percent. This reduction in impervious surface would not have a significant impact on improving water quality in light. By designing the landscape areas to serve as bioretention areas and by enhancing the Mission Creek Corridor, impacts to surface water quality could be reduced.

AA-128

Page 11-1, Section 11.1: The project (construction and operation) will significantly increase ambient noise levels in the neighborhood. The peak noise levels from the helicopter operations, which will come at unknown times and will be of an unknown duration, will be disruptive to speech, sleep, and other normal residential activities.

Considering the periodic but extremely disruptive noise from the helicopters and parking garages, the EIR must include a threshold of significance similar to one used by the County of Santa Barbara, which basically states that a significant increase in ambient noise levels, even those below the residential standards of 60 dBA Ldn exterior and 45dBA Ldn interior would represent a significant noise impact. This standard is also recognized in the state CEQA guideline model initial study, which asks the following question "*would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*" The response to that question with respect to both the helicopter operations and the parking structures is clearly "potentially significant".

AA-129

Page 11-3, Helicopter Noise Methodology:

As noted in my letter responding to the NOP and in correspondence to the City date July 24, 2003 the Acoustical Analysis Associates, Inc. report referenced and used in the EIR to assess noise impacts is flawed. The following deficiencies were noted:

AA-130

- No nighttime flights were modeled. The estimated Ldn noise levels specifically only assume 1 landing and takeoff operation in a 24-hour period during daylight hours (7am-7pm).
- It is not clear that the duration of the helicopter test fully accounted for the flight time associated with a true trauma case. Where is the estimate of 2 minutes derived from? Were flights at Goleta Valley timed? Does the 2-minute timeframe begin once the helicopter makes its turn into the hospital from Highway 101.
- No ambient noise measurements were established at any residentially zoned areas.

AA-131

AA-132

- Measurement site 4 that reportedly is representative of the ambient noise level in the residential areas is not representative of ambient noise conditions at the Parkway Drive residences that are located on a private street without through traffic. The noise level at this location was recorded as 53 dB (A). Based on noise measurements conducted by the EIR preparer noise levels actually recorded on Parkway Drive (see Table 11.C, page 11.11) were 49.3 dBA Leq at 5:49 p.m. Nighttime noise levels would be expected to be significantly less than this level. **AA-133**
- There is no indication in the project description on how helicopter trips will be limited to 2 per week, therefore the study does not present a reasonable worst case analysis and underestimates the noise impacts. **AA-134**

As identified in my comments on the NOP, the helicopter flight should have been rerun and noise measurements should have been collected at sites that are truly representative of the sensitive land uses within the neighborhood.

The issue of helicopter noise is so significant nationwide that the FAA has initiated a congressionally mandated study<sup>13</sup> on the effects of nonmilitary helicopter noise on densely populated areas. Page 9-9 of the EIR, Aircraft Safety Regulations states, "emergency aircraft flights for medical purposes are exempt from local ordinances that restrict the departure or arrival of aircraft based upon the aircraft's noise level or that restrict the operation of certain type of aircraft". While much is being done to minimize the noise impacts of fixed winged aircraft (including restrictions on nighttime arrivals and departures and requirement to phase in quieter aircraft), little is being done to control helicopter related noise. **AA-135**

Page 11-5, Stationary Noise Impacts: The EIR analysis must include the noise impacts associated with long and short term dewatering equipment at the Pueblo Garage site. **AA-136**

Page 11-6, Combined Noise Analysis Methodology: The bottom line in the qualitative combined noise analysis is that noise levels in the project area will significantly increase with implementation of the project over the construction period and during long term operations. **AA-137**

Page 11-19, Helicopter Operations Impacts: According to the EIR, residences at location 4 (closest to Parkway Drive but not representative of Parkway Drive noise levels) will experience noise levels up to 93.3 dBA. This noise level is equivalent to freight train at 50 feet. This noise level would be 44 decibels above the afternoon noise level of 49.3 dBA at LSA's measurement site M-9. The EIR concludes that "at all five exterior monitoring sites, the maximum helicopter noise levels would exceed the daytime noise threshold of 75 dBA Lmax and nighttime noise threshold of 70 dBA Lmax." With respect to monitoring location 4, it would exceed these thresholds by 18 and 23 decibels respectively. The EIR goes on to state: Therefore, land uses surrounding the proposed helicopter flight paths would be subject to high noise levels and result in community **AA-138**

<sup>13</sup> H.R.1000 - Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (AIR-21) Section 747. Nonmilitary Helicopter Noise

annoyance. Thus a single event during the day or night represents a significant and unavoidable noise impact.

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In the 3<sup>rd</sup> paragraph in this section the EIR states, "as proposed by SBCH, helicopter approach and departure operations for medical emergencies would occur up to twice per week". Cottage is not proposing two flights per week; they are estimating two flights per week.

AA-139

The EIR is correct in acknowledging that noise impacts will be significant and unavoidable. However, the EIR should acknowledge that the impact would be significant regardless of the actual number of nighttime flights. As noted above, without averaging the noise level, one day or nighttime flight will be significant under the threshold of 75 and 70 dBA L<sub>max</sub> established in the EIR. This would also be a significant and unavoidable impact under the CEQA initial study threshold discussed previously. It is inappropriate to take this extremely noisy event average it over 24 hours and apply the L<sub>dn</sub> standards alone to determine the significance. Two flights in one evening are not a worst-case analysis but a real likelihood. One major evening car accident along Highway 101 could result in multiple nighttime helicopter flights.

AA-140

In addition, to limiting nighttime helipad operations to emergencies only a very feasible and cost effective mitigation measure to reduce noise impacts to the maximum extent feasible would be to establish the 70 dBA L<sub>max</sub> noise contour associated with the helipad operations and fund the retrofitting of residences with double glazed/paned windows affected by this noise contour. This mitigation could be offered on a one-time basis and for a set duration after which time the measure would expire. Since the City and the region as a whole will enjoy the tremendous benefit provided by the helipad, the City and Cottage could partner to fund this mitigation measure. The reduction in interior noise levels afforded by this mitigation would be measurable and would significantly improve the livability of the neighborhood following completion of the retrofit and helipad installation.

A-141

Page 11-20, Table 11.H: Why were the noise levels associated with the windy day path less than the normal path at measurement site 4?

A-142

Page 11-23, 2<sup>nd</sup> Paragraph: The EIR incorrectly identifies noise impacts associated with the Pueblo Parking Garage. The EIR notes that noise levels will be up to 75 dBA L<sub>max</sub> at the adjacent residences and notes that the parking structures would result in community annoyance. The EIR suggests that exterior to interior noise reduction provided by a residential structure are 12 dBA with windows open and 24 dBA with windows closed. These reductions may be associated with more modern construction but are unlikely to be achieved within the 1920s homes surrounding the garage.

A-143

The EIR notes that with windows closed, interior noise levels would be 51 dBA L<sub>max</sub> and states this noise level would be similar to or less than normal household activities. This would clearly not be the noise level associated with people who are sleeping. Further with windows open (which is common because most of these old home do not

have air conditioning), interior noise levels would be 63 dBA L<sub>max</sub> (assuming the 12 decibel reduction is accurate), which is clearly above normal residential activities.

Noise impacts associated with the parking garage would be reduced but not eliminated by retrofitting with double pane windows, closing the top (unenclosed) levels of the Pueblo garage at night, and implementing a program either to prohibit the use of car alarms or to record license plates so that car alarms can be disengaged if the go off.

**A-143**

Page 11-28, HVAC Noise Impacts: Would there be any ventilation systems associated with the parking garages particularly for the subterranean levels? If so, where would the systems be located and what would be the noise impacts to adjacent residences?

**AA-144**

Page 11-33, Sensitive Receptor R-6: This receptor location is the closest to the Parkway residences. The EIR states the following, "the Pueblo parking structure, helipad operations, and loading zone are all intermittent noise sources; however, in combination, these sources are expected to result in an appreciable increase in composite noise experienced at this receptor location compared with existing conditions." The EIR must conclude this statement by recognizing that the composite noise impacts will be significant and unavoidable and must include the mitigation described previously to reduce this impact to the maximum extent feasible as required under CEQA. It should also be noted that the Parkway Drive residences would also be impacted by noise from the day care facility. We would ask that use of the outdoor areas not occur before 7:30 a.m. However, the residents have accepted the day care as an appropriate use next to our homes and do not believe the noise impacts will be significant.

**AA-145**

Page 11-34, Summary of Long-term Continued (should be combined) Noise Impacts at Sensitive Receptors: The section completely contradicts the analysis on page 11-33 quoted above. The analysis of 11-33 states that there will be an "appreciable increase", but this section states the noise effects would be "discernable". There is a substantial difference between a noise that is discernable versus one that is an appreciable increase. The EIR once again masks the level of impact by averaging these noise events (many of which will that will occur during nighttime) over a 24-hour period).

**AA-146**

There will clearly be a noticeable increase in ambient noise level and this increase will be significant and unavoidable.

Page 11-34, Project Long-Term Noise Mitigation Measures

N-3, Helicopter Activity Records: Why was this mitigation measure changed from the measure included when the helipad was previously approved? The measure now states helicopter operation will be reevaluated when there is an increase by 50 trips other than emergencies. Previously it was 50 trips above the estimated 2 trips per week regardless of type (emergency or non-emergency).

**AA-147**

The following mitigation measures are required to reduce long-term noise impacts:

**AA-148**

- ◆ Pay for the purchase and installation of double pane windows on residences impacted by construction and helicopter noise.
- ◆ Prohibiting use of the top level of the Pueblo parking garage after 8:00 pm and turn off light one hour after the level is closed.
- ◆ Require that users of the garages not engage their car alarms and require users to register their vehicle license plates numbers and parking locations so that car alarms can be disengaged if they do go off...
- ◆ Develop and implement operation plan demonstrating use of the best available helicopter technology and flight practices for reducing noise and vibration impacts. Review the approach and departure angles by a helicopter acoustical expert to ensure that they provide the maximum noise mitigation.
- ◆ Implementation of the helicopter industry associations "fly neighborly program" including beginning decent before reducing air speed, using steeper approach/departure angles or making turns in the direction of the tail rotor.
- ◆ Restrictions on the use of helicopters for other than trauma or other emergency cases (provide definition for emergency)
- ◆ Provide a 24-hour contact person to report violations of the proposed helicopter flight path.
- ◆ As a part of the Specific Plan and rezone require that the helipad operate under a conditional use permit and require yearly evaluations of helicopter flight activity. Designate ambulance routes within the neighborhood to avoid residential areas and prohibitions on the use of sirens except where absolutely necessary for safety after 8:00 pm or before 7:30 am.
- ◆ Require that the exterior areas of the day care center not be use before 7:30 am

AA-148

Page 11-35, Section 11.6.3, Specific Plan Long-Term Impacts

The Specific Plan and hospital zone district eliminate the following finding, which is directly relevant to the noise impacts generated by the project:

*"Such uses will not be materially detrimental to the public peace, health, safety, comfort and general welfare and will not materially affect property values in the particular neighborhood involved;"*

AA-149

This finding is relevant to both significant and nuisance noise impacts.

Page 11-37, Section 11.6.5 Cumulative Noise Impacts

As there is growth in the community and as the freeways become more crowded, the number of helicopter flight is likely to increase. Concurrently, as the Oak Park Neighborhood continues to buildout there will be a cumulative increase in the number of residents exposed to the significant noise levels from the helipad operations.

AA-150

Page 11-47, Noise Impact Pueblo Parking Structure, Residential

AA-151

The EIR should include a map showing the Lmax noise contours for the different phases of construction. Demolition and construction activities will be immediately adjacent to the residences along Parkway Drive.

AA-151

The EIR correctly concludes that construction noise impacts would be significant. Other measures that are required to reduce noise impacts include:

- ◆ Construction of a solid noise barrier similar to the barriers constructed around the city's well sites during construction.
- ◆ Eliminating the proposed construction staging area proposed to be adjacent to the residences on Parkway Drive and Los Olivos Street.
- ◆ Adherence to the EIR required construction days and times. If it truly can be demonstrated that not allowing construction on Saturdays will compromise the ability of the hospital to continue to use its acute care facilities after 2013, then some Saturday construction may be acceptable. However, it should be extremely limited next to residential zoned property, it should not be allowed to commence before 9:00 a.m. and should end by 5:00 p.m. and the windows on the adjacent home should be retrofitted with double pane glass to reduce interior noise levels (double pane windows would not mitigate exterior noise levels).
- ◆ Monthly meetings with all neighbors during construction to examine what happened and what will happen and identify ways to further measures to minimize neighborhood impacts
- ◆ Provide a construction monitor from the City who will be accessible 24 hours per day 7 days per week who has the authority to stop construction if the construction noise hour restrictions are violated.
- ◆ Restrict construction workers from driving into the project area, arriving before the designated work hours, and using radios at the construction sites.
- ◆ Prohibit construction staging areas adjacent to residentially zoned lands.
- ◆ Identification of a 24 hour contact who is authorized to stop construction
- ◆ Mobilization and demobilization review of the project
- ◆ Reopener provisions to allow additional measures to be added if measures are not working or new measures are determined to be appropriate.

AA-152

Page 11-51, Construction Vibration Impact, Pueblo Parking Garage, Residential: According to a 2002 Caltran's Study<sup>14</sup>, extreme care must be taken when sustained pile driving occurs within 15-30 m (50-100 ft) of a historical building, or building in poor condition. The study goes on to state that when high levels of construction vibrations (such as from pile driving, demolition, and pavement breaking) are expected at residences or other buildings, it is recommended that a detailed "crack survey" be undertaken before the start of construction activities. The survey may be done by photographs, videotape, or visual inventory, and should include inside as well as outside locations. All existing cracks in walls, floors, driveways, etc. should be documented with sufficient detail for comparison after construction to determine whether actual vibration damage has

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<sup>14</sup> California Department of Transportation. Transportation Related Earthborne Vibrations, Technical Advisory, Vibration TAV-02-01-R9601, February 20, 2002.

occurred. The study concludes that if vibration concerns involve pavement breaking, extensive pile 25 ft or less from normal residences or, buildings, or unreinforced structures or within 15 m – 30 m (50 ft- 100 ft) from historical buildings, or buildings in poor condition, damage is a real possibility.

As noted demolition and construction activities will be immediately adjacent to the homes on Parkway Drive and Los Olivos Street. Due to the lath and plaster construction of our homes and the overall age of the homes, the foundation, walls, and roofs could suffer significant damage during construction activities including to but not limited to pile driving. In addition, the construction vibrations could damage windows, antiques and glassware within our homes.

How will the presence of oversized boulders in the construction area effect vibration levels?

Mitigation Measure N-8: This measure does not provide the actual mitigation, which is to repair any damage related to the construction. This measure must include the preparation of annual crack surveys for adjacent residence and structures within 500 feet of construction and require that Cottage repair or compensate for any damage (structural or house contents [e.g. antiques]) resulting from their construction. A list of the APN numbers that would be subject to this mitigation measure should be provided.

Page 11-66, Construction Noise and Vibration Impacts (Cumulative)

The EIR must evaluate the cumulative noise impacts associated with other pending project within the neighborhood including to but not limited to the new Condominium development on Castillo Street, the Diabetes center expansion, etc.

Figure 11.4, either the scale bar is inaccurate or the mapping on the photo is inaccurate but using the scale bar included on the photo, the shaded areas do not include all properties within 500 feet of construction as required in mitigation measure N-8. The area shaded appears to be less than 100 feet from the edge of construction. My home which will be directly adjacent to construction activities in land use area C is only partially included in the area designated to be subject to a crack and video survey.

Page 13-2, Parking Threshold of Significance: The most typical threshold of significance for a parking related impact is whether the proposed parking meets the jurisdiction's zoning ordinance parking standard for the use proposed. The city's requirement for hospitals is at least one (1) parking space for each bed in the total capacity of such institution<sup>15</sup>. The project as proposed well exceeds this standard.

Page 13-5, Circulation Element: As noted in my introductory comments the project is inconsistent with several Circulation Element Policies and implementation strategies.

<sup>15</sup> City Zoning Ordinance, Title 28, Section 28.90.100.J.9

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AA-158

Page 13-9, Parking Facilities: The 2<sup>nd</sup> sentence in this section is inaccurate. Visitor lots are not controlled and it cannot be confirmed that lots are used solely by hospital users. In addition, Sansum doctors are provided spaces at the exiting employee parking structure.

AA-159

Page 13-13, Neighborhood Traffic Management Program: The key objective of the program was to take back the streets from the cars.

The parking deficiencies in the neighborhood are complex and go beyond the demand created by the medical workforce. These complications include the fact that almost all of the apartment complexes in the neighborhood are under parked (although most meet the city's requirement), the presence of legal and/or illegal second units without adequate parking, residents (as we all do) using dedicated garage space for storage rather than for parking vehicles, inadequate parking for adult education and Sansum, and vehicles (possibly being used as residences) parked in unregulated spaces for extended periods of time. The resolution to these complicated parking problems is not necessarily to provide unlimited parking but to reduce trips and park more efficiently.

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Page 13-15, Section 13.6.1: As discussed in the introductory comments the fact that licensed beds would decrease should have no bearing on the impact analyses. Since the hospital has not in the past nor does it now physically have 456 beds.

AA-161

The EIR appears to rely on information contained in the Kaku study. This study is flawed for the following reasons:

In addition to using an inaccurate baseline, from a statistical perspective the data gathered for Cottage's parking surveys appears to provide an inadequate sample size. On the two days the employees were surveyed, respectively 181 and 112 employees participated in the survey. This represents a participation rate of 10% for the first day and approximately 7% for the second day. Similarly the sample size for the visitor survey appears inadequate. According to the traffic study, Cottage receives approximately 787 visitors per day and only 153 visitors (over a two day period) participated in the survey. Assuming 80 survey responses per day this also represents about a 10% participation rate. To base the parking assumptions on these small sample sizes and limited sampling period is questionable. Further, when Cottage completed its recent employee parking survey a key question that was missing was why the employee drives alone to work and what incentives Cottage might offer to encourage the use of alternative transportation. The parking and traffic study did not also consider Cottage's proposed development of workforce housing at the St. Francis site and the potential use of vans to reduce parking demands and traffic between the hospital and the housing site.

AA-162

At no time in the past, during the environmental review on the existing parking structure, or in any subsequent Cottage projects approved since construction of the existing parking structure, or when portable diagnostic trailers occupied available parking, or when the Rehabilitation Institute relocated to its Del la Vina site and acquired some of Cottage's parking, was it disclosed that there was in excess of a 400 space parking deficit. I have

AA-163



reviewed numerous Cottage and City documents in which it was consistently stated<sup>16</sup> that the parking met or exceeded all city standards and was more than sufficient for operation of the hospital. To argue now that the parking is wholly inadequate clearly contradicts the administrative record of all the prior hospital related approvals.

The proposed parking ratio would be almost 4 spaces licensed bed and about 6 spaces per average occupied bed. The Institute of Traffic Engineers average peak parking demand for hospitals (in suburban area where high vehicle use is expected) is an average rate of 1.79 spaces per bed with the maximum 2.96 spaces per bed. The City zoning ordinance requires a minimum of 1 space per bed, the county requires one space per two beds and one space per 3 employees. Based on these standards the project will be over parked.

AA-163

#### Page 13-19, Future Baseline Traffic Volumes

The following projects must be included in the future baseline traffic volumes: Several new condominium project along De la Vina between Constance and Mission, the new condominium project on Castillo Street near Padre, the expansion of the Diabetes Center, and the new Cancer Center.

AA-164

Page 13-29, Improve Neighborhood Circulation: In 1984, when Cottage received approval for its Centennial Wind expansion it committed to the Planning Commission and the public that if Castillo Street were abandoned it would provide a pedestrian easement and access. This requirement was adopted as a condition of approval. To compensate for the closure of Castillo Street, pedestrian access should be enhanced throughout the neighborhood. This could include sidewalk improvements, curb cuts for handicap access (e.g. at the north west intersection of Los Olivos and Castillo Street), additional greening of the streetscape and removal of overhead transmission lines. The cost of some of these improvements could be recouped by charging a parking fee at the new garages.

AA-165

Page 13-29, Neighborhood Street Analysis: It seems very inappropriate to use a single 24-year-old study to determine the change in the livability of the residential streets surrounding the hospital.

AA-166

Page 13-32, Parking Impacts: 1<sup>st</sup> Paragraph, the surveys prepared by Kaku had a less than 10% response rate for employees and visitors; therefore the EIR cannot substantiate that only 73% of the existing parking is provided off street. Further the parking analysis fails to account for the relationship between the adjacent doctor's offices and the hospital. A large majority of the doctors who have offices within the Oak Park are (including most of Sansum's doctors) serve, or have privileges to use, Cottage's facilities. In addition, Cottage is proposing to convert the Knapp Building into medical office spaces and

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<sup>16</sup> November 20, 1997 Staff Report for the Rehabilitation Institute, Planning Commission Staff Report for the approval for the temporary location of an accessory mobile medical laboratory, January 6, 1982 letter from Fred Sweeney, agent for Santa Barbara Cottage Hospital re: Temporary trailer for Body Scanner, January 7, 1988 Planning Commission Staff Report for the mobile lithotripter, and September 16, 1971 letter from Rodney J. Lamb.

presumable a majority of the doctors will also serve Cottage. It seems duplicative and unnecessary to provide parking for all of these doctors at the hospital and then again at their offices only a block or two away from the hospital

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2<sup>nd</sup> Paragraph: The text indicates that the existing off street parking supply is 888 spaces; however, Figure 13.2.b shows only 884 spaces. In addition, the numbers do not account for the 83 additional spaces at Cottage's outpatient surgery facility, the increase in the total number of cars that can be parked through the existing valet parking, and the shared parking at a local church. The EIR also does not disclose that a great deal of the parking problem is due to overlapping shifts, which create significant parking inefficiencies during the overlap periods

AA-168

3<sup>rd</sup> Paragraph: The visitor parking lots are unrestricted and not monitored therefore it cannot be assumed that 100% of the spaces can be attributed to the hospital. Further, parking for Sansum doctors is provided in the Employee parking lot whether or not the doctors are serving the hospital.

AA-169

Page 13-33, Table 13.J: The parking utilization factors are disheartening and should not be the model for the future hospital. According to the factors, 90% of cottages employees (over 1,600) and volunteers drive alone and that 100% of the doctors even those with offices in Oak Park drive alone and drive from their oak park offices to the hospital.

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Cottage has indicated they wish to solve the concerns of the area residents regarding parking within the residential areas. I support this goal, however just as widening freeways does not improve traffic flow over the long-term, nor does providing unlimited parking solve parking problems. There are parking garages all over the downtown area, however downtown employees still reach out into the surrounding residential neighborhoods to park. The goal must be to increase the incentives for employees not to drive (through pay back programs and other tangible incentives), make maximum use of the existing parking by use of valet and shared parking and ensure that the general hospital public has access to convenient alternative transportation options and adequate parking when it is necessary to drive. Cottage hospital's traffic study (Kaku, September 2003) included a survey to identify the transportation habits of its staff. According to the survey 61% of those responding live within the 93101, 93103, and 93105 zip codes. These codes essentially encompass the city of Santa Barbara. What can be done to encourage the individuals who live within these zip codes (generally less than 5 miles from the hospital) to use alternative transportation?

AA-171

The EIR suggests that the current hospital has a deficit of over 300 spaces and that on street parking is being used to accommodate the shortfall. As discussed above, at no time in the past, was it suggested that such a significant deficit existed. How was the hospital allowed to provide 75 parking spaces for surrounding uses (see EIR page 3-15, 3<sup>rd</sup> Paragraph) when it had over a 300-space deficit?

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According to the EIR, the 337-bed hospital will create a demand for 1,359 parking spaces. The proposed parking ratio would be almost 4 spaces licensed bed and about 6 spaces per average occupied bed. The Institute of Traffic Engineers average peak parking demand for hospitals is an average rate of 1.79 spaces per bed with the maximum 2.96 spaces per bed. Based on these parking rates the project will be over parked.

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According to the project description contained on page 3-15, the project includes a total of 1,252 parking spaces in the parking garages and surface parking. An additional 83 spaces are available at out patient surgery, for a total of 1,335. Other spaces are potentially available at the Fletcher building. Even if the forecasted demand of 1,359 spaces were correct (which I do not believe it is), the shortfall in parking considering all available surface and garage parking would be 24 spaces without using on street parking. An aggressive TDM program with cash-out incentives combined with a shuttle between St. Francis and the hospital would easily meet this deficit.

AA-174

Page 13-36, TRF-4: It seems ridiculous that with significant traffic impacts and significant air quality impacts, that the EIR is suggesting the construction of additional parking spaces. The key to successful TDM program is to reduce the availability of parking coupled with increasing the incentives to not drive. This EIR mitigation measure should be revised to allow any shortfall to be made up through the TDM program (a 10% increase in the program would exceed the deficit), by use of shared parking, by use of an employee van between St. Francis and Cottage, or by valet parking rather than constructing new parking. In fact, the city's zoning ordinance specifically allows a modification to the parking requirements set forth in the ordinance with implementation of a TDM program<sup>17</sup>.

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The neighborhood parking supply in the residential areas could be protected by implementation of a residential permit-parking program during and after construction. Currently because residents are not exempt from the time limit requirement several of the blocks within in the residential areas surrounding the hospital are significantly underutilized. Residents located on these time restricted street park further out into the neighborhood on those streets without time restrictions, thereby displacing the on-street parking opportunities for the residents on those streets.

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Outside of the residential areas, within the C-O zoned areas it is perfectly appropriate that the on-street parking be allowed to serve Cottage and the other medical offices and facilities as it currently does. In fact, it may be appropriate to increase the parking time limit (e.g., to 2 hours) in these areas to allow the on-street parking to better serve the visitor needs.

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<sup>17</sup> Zoning Ordinance Section 28.90.001

PROGRAM FOR ALTERNATIVE TRANSPORTATION MODES. A method for reducing the number of parking spaces required by this chapter for any land use is by granting a modification in accordance with Municipal Code Section 28.92.026 if the property owner files and obtains approval of a program of alternative transportation modes or other approved measures for employees working on the parcel and pays the City for any periodic verification procedures and expenses associated therewith.

Page 13-46, TRF-7: Rather than providing all of the spaces why not get people used to using alternative transportation during the construction period.	AA-178
Figure 13.1: There is no handicap ramp at the northwest corner of the Los Olivos/Castillo street intersection. This ramp should be installed as a part of the project.	AA-179
Figure 13.2B: The location of the childcare facilities is inaccurate and parking associated with outpatient surgery is not shown.	AA-180
Figure 13.18: The locations of other surface off street parking lots are not shown and the parking associated with outpatient surgery is not shown.	AA-181
Page 14-5: Urban Design Guideline No 8.2.1: The project is inconsistent with this guideline.	AA-182
Page 14-9, Views: Mountain views are available from the project area streets and from the residences.	AA-183
Page 14-10, Land Use/Architecture: The homes along Parkway Drive and extending onto Los Olivos Street were all constructed in the early 1900s and retain the early 1900s visual quality and architecture.	AA-184
Page 14-13, View Impacts: The EIR must consider the Appeal Court's findings regarding impacts to private view sheds in Ocean View Estates vs. the Montecito Water District.	AA-185
Page 14-13, Section 14.6.1: Through the ABR process the project has undergone significant architectural changes and I believe overall that the appearance of the main hospital structure will be aesthetically pleasing. In addition, significant changes have been made to the location, height and scale of the Pueblo Parking Garage that improve its appearance. However, these improvements do not negate the fact the total increase in the square footage of new development associated with the hospital, the elimination of the 45 foot height limit and introduction of a new 60 foot height limit, the loss of 324 trees which may take decades to reach maturity represents a significant and unavoidable change to the visual qualities of the project area both on project specific and cumulative basis. With regards to the removal of the project area trees, Page 6-17 of the EIR states, "these removals represent a loss of an estimated 83,592 square feet (1.9 acres) of tree canopy that provides habitat for local wildlife, as well as providing shade opportunities and contributing to the aesthetic character within the Oak Park neighborhood." Once again it may take decades before this mature tree canopy is reestablished. Further there will be a significant increase in night lighting that will change the nighttime sky throughout the neighborhood. Impacts to off site residences may be reduced but the change in the overall nighttime character would be significant. A number of measures have been presented through out this comment letter that would help reduce the impacts including under grounding of transmission lines, improvements in the greenscape	AA-186

throughout the neighborhood, eliminating the night time use of the top level of the parking garage, etc.

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Page 14-14, 1<sup>st</sup> and 2<sup>nd</sup> Paragraph: The visual simulations in the EIR do not appear to be accurate with respect to the proposed development and may not accurately depict the proposed height of landscaping. It has not been demonstrated in the EIR that the species and plant sizes proposed will achieve the stature and visual screening depicted in the visual simulation within 5 years. Further, the EIR must disclose the estimate timeframe to achieve the proposed views with mature landscaping. In addition, the simulation does not consider the worst case which is that many of the trees proposed to be retained may not survive construction.

AA-187

Page 14-15, View 9: Many members of the neighborhood enjoy the visual qualities of this remnant 1920s neighborhood. This area represents a visual anchor to the neighborhood's history. Further, the entire length of Los Olivos Street, including the intersection of Los Olivos Street and Parkway Drive is designated as "open space" and "buffer" in the City's General Plan) (see EIR Figure 4.2). Therefore, this site represents an important viewing location.

AA-188

Page 14-20, View 9: I don't believe that anyone would point to Sansum or the apartment complex as architecture that we would want to emulate today. The EIR's conclusion of a less than significant impact is based on the current location and height of the proposed garage. These setbacks and height limits should be reflected in the Specific Plan standards for Land Use Area C. In addition, a new Land Use Area D should be created to encompass the area proposed for the day care facilities to ensure that any future development in these areas is visually compatible with the adjacent residential neighborhood.

AA-189

Page 14-22, Summary of Aesthetics/Compatibility Analysis

As discussed in my introductory comments, the EIR understates the visual impact of the project. By understating the impact, the EIR ignores feasible mitigation that can help to compensate for the significant change in the visual quality of the area.

AA-190

Page 14-23, 2<sup>nd</sup> Paragraph: Per page 14-9 existing lighting is 0.086 to 0.128 foot candles near the residences (probably less at the actual residences), so how is lighting reduced? In addition, the top level of the garage will be lighted. What are the lighting levels at 84 feet from the existing garage?

AA-191

Page 14-24: 5<sup>th</sup> Paragraph: How can the EIR conclude that the potential increase in lighting is substantial and then in the next sentence conclude that it is not? What neighborhoods will the lighting be consistent with?

AA-192

Page 14.6.2 Visual Mitigation Measures: It is somewhat incomprehensible that with all the visual changes resulting from the project that only one visual mitigation measure is proposed. Additional measures that would help to reduce the significant visual impacts

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AA-193

include under grounding transmission lines throughout the neighborhood or at a minimum from Los Olivos Street to Junipero Street and from Mission Creek to Bath as well as other measures discussed in this letter.

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**AA-193**

Page 14-29, View Impacts (Cumulative Long-term): As noted in my introductory comments, the project historic and current contributions to significant changes in the visual qualities of the Oak Park Neighborhood are cumulatively considerable. The project specific mitigation measures presented previously in this letter would help reduce this cumulative impact.

**AA-194**

Page 14.8b: Has consideration been given to installing sandstone curbs along the hospital frontage to be consistent with the surrounding neighborhood and provide a visual anchor to the past. Has consideration been given to installing sandstone walls similar in appearance and character to the County courthouse?

**AA-195**

Page 14.11a: To my knowledge the new Pueblo Parking Garage is not proposed to be white plaster. Is the fence in front of the proposed daycare facility really going to be wrought iron, 6 feet in height? The fencing proposed is not consistent with the bungalow character. The simulation does not appear to include the proposed preschool building or it does not appear to be in the correct location. In the site plans, the two day care building appear to been in alignment along Castillo Street.

**AA-196**

**AA-197**

**AA-198**

Section 15.0, Alternatives: I will not provide detailed comments on the alternatives since it is apparent that it is not Cottage's intent nor the city's desire that the hospital be redeveloped outside of the Oak Park area. A few general comments on the alternatives follow.

Alternative 3D: Reduced Parking Structure Size: The alternative would reduce the Class I air quality and transportation impacts, reduce visual impacts, reduce noise impacts (fewer cars) and reduce land use compatibility impacts. The reduction in the 249 parking spaces could be made up, with an aggressive TDM program, van pool between St. Francis and Cottage, shared parking and valet parking.

**AA-199**

Alternative 3E: Underground Parking: The alternative would reduce the visual, noise and land use compatibility impacts associated with the Pueblo Garage. Malicious acts could occur with or without the underground garage and parking underneath Paseo Nuevo mall or most new building throughout the City provides equal potential for a malicious act. It is not clear why hazardous materials would be greater. Wouldn't CO build up be the same as for the subterranean level of the Pueblo Garage? The Pueblo garage site will also require short and possibly long term dewatering. How is water quality impacts increased? The construction would be further away from the surrounding residences, therefore noise and vibration impacts would decrease. Valet parking, shared parking, and alternative transportation could be used to make up the short and long-term parking deficit. The freed up area could be used for workforce housing.

**AA-200**

Alternative 3F: Alternative Parking Structure Location: The proposed Pueblo Garage includes 635 spaces not 652. The alternative would not be consistent with Cottage's stated objective of "hospital design and operations that are compatible with the surrounding neighborhood to the extent possible". It is not clear that this alternative is even feasible unless the adjacent properties were acquired or zero setbacks were allowed on all sides. The alternative would generate increased visual impacts, increased noise impacts, increased vibration impacts, and significant land use compatibility impacts. This alternative should be eliminated from the EIR analysis. More appropriate alternative locations include the Sansum Parking lot and the lots east of the medical buildings on Bath Street.

AA-201

Alternative 4B: Goleta Valley Cottage: The basic premise for rejecting this alternative is faulty. It is assumed that the development of the same size hospital at the site is constrained by existing zoning. However, similar to the proposed project, a rezone to allow a greater height could be pursued which would allow the hospital reconstruct at a similar size. This site has far fewer environmental constraints than the current hospital site including better arterial access, not located within 100-year floodplain, reduced land use conflicts since not adjacent to a residential neighborhood, reduced noise and vibration impacts, etc. This site has medical support uses surrounding it and ample commercial space available in close proximity and has an existing helipad, which has been historically and is currently used.

AA-202

Alternative 4C.3: Earl Warrant Show Grounds: As per a News Press Article dated November 7, 2004, the facility is on the state's surplus property list and may be for sale.

AA-203

Page 15-48: Alternative 3D: The conclusion statement is incorrect. The alternative would still increase the amount of parking, reducing impacts over existing conditions. Further reducing the amount of available parking while enhancing the incentives not to drive will likely reduce traffic and in turn reduce air quality impacts associated with the proposed project.

AA-204

Alternative 3E: The conclusion that hazards are increased is not supported by the analysis. Hydrology impacts would be the same. Noise and vibration impacts would be less, visual impacts would be less and traffic and circulation impacts would be less.

AA-205

Page 16-5, Section 16.3 Growth Inducement

The proposed project displaces a number of existing medical offices and will occupy a significant number of the remaining C-O zoned parcels within the Oak Park area. The hospital expansion coupled with the closure of St. Francis and likely closure of Goleta Valley will result in potential growth inducement in the Oak Park area by drawing additional medical commercial development into the area. These growth-inducing impacts have not been adequately addressed in the EIR. The City should initiate a General Plan update for the Oak Park neighborhood to consider its long-term vision for the surrounding neighborhood and should consider including the neighborhood as a redevelopment area.

AA-206

Summary of Key Mitigation Measures (see other measures included in the comments):

- ◆ Monthly or Quarterly meetings with all neighbors during construction to examine what happened and what will happen and identify ways to further measures to minimize neighborhood impacts
- ◆ Advance notice of all construction activities, road closures, utility interruptions
- ◆ Mobilization and demobilization review of the project
- ◆ Reopeners provisions to allow additional measures to be added if measures are not working or new measures are determined to be appropriate.
- ◆ Pay for the purchase and installation of double pane windows on residences impacted by construction and helicopter noise.
- ◆ Mitigation for dust related damage to surrounding residences.
- ◆ Ensure that solid walls within the parking garage are designed to attenuate sound.
- ◆ Dimming of lights within the hospital after 9:00 pm.
- ◆ Prohibiting use of the top level of the Pueblo parking garage after 8:00 pm and turn off light one hour after the level is closed.
- ◆ To reduce the visual clutter and improve safety of the helipad operations and to mitigate for the significant change in the visual quality of the Oak Park Neighborhood, underground aboveground utility lines throughout the neighborhood or at a minimum within and around each block affected by the Specific Plan. (e.g. Castillo between Los Olivos and Pueblo, Los Olivos between Castillo and Oak Park Lane, Parkway Drive, Oak Park Lane between Los Olivos and Pueblo, etc.)
- ◆ Require that all graffiti be cleaned up within 24 hour of its occurrence.
- ◆ Set height limits in Land Use Area C at 30 feet (not withstanding architectural projections) and the zone district should be revised to include the findings currently including in the Conditional Use Permit regarding visual impacts, visual compatibility, and effect on property values.
- ◆ Establish a new Land Use Area D to encompass the day care facilities and provide uses that are compatible with the adjacent residences (e.g., work force housing).
- ◆ Street sweeping to prevent dust from being carried on the adjacent streets and remobilized by project area traffic.
- ◆ To mitigate storm water quality and other indirect impacts (lighting, noise, etc), and to mitigate for the lost habitat values from the native and mature tree removal, Cottage should prepare and implement an enhancement/restoration plan for Mission Creek within the Oak Park Planning area.
- ◆ Require that users of the garages not engage their car alarms and require users to register their vehicle license plates numbers and parking locations so that car alarms can be disengaged if they do go off.
- ◆ Use of the quietest helicopters and yearly review and installation of BAST noise reduction equipment for helicopters
- ◆ Develop and implement operation plan demonstrating use of the best available helicopter technology and flight practices for reducing noise and vibration impacts. Review of the approach and departure angles by a helicopter acoustical expert to ensure that they provide the maximum noise mitigation.

AA-207



- ◆ Implementation of the helicopter industry associations “fly neighborly program” including beginning decent before reducing air speed, using steeper approach/departure angles or making turns in the direction of the tail rotor.
- ◆ Limitations on the use of helicopters for other than trauma or other emergency cases (provide definition for emergency)
- ◆ Provide a 24-hour contact person to report violations of the proposed helicopter flight path.
- ◆ As a part of the Specific Plan and rezone, require that the helipad operate under a conditional use permit and require yearly evaluations of helicopter flight activity.
- ◆ Preparation of annual crack surveys of walls, floors, foundations and driveways for residence within 500 feet of construction and require that Cottage repair any damage (structural or house contents [e.g. antiques]) resulting from their construction activities.
- ◆ Provide a construction monitor from the City who will be accessible 24 hours per day 7 days per week who has the authority to stop construction if the construction noise hour restrictions are violated.
- ◆ Prohibit construction staging areas adjacent to residentially zoned lands.
- ◆ Require that the exterior areas of the day care center not be used before 7:30 am.
- ◆ Initiate an update of the General Plan for the Oak Park Planning Area immediately following approval of the hospital reconstruction project.
- ◆ Amend the project area for redevelopment to include the Oak Park Planning Area
- ◆ Use existing housing set aside funds for residential rehabilitation and reconstruction projects within the Oak Park Neighborhood.
- ◆ Specific safety measures such as video camera, emergency call boxes, and periodic day and nighttime security patrols must be implemented within the parking garages.
- ◆ Implement a residential permit-parking program. Put the program in place prior to construction to deter construction related parking.
- ◆ Implement the recommendations of the Oak Park Mobility plan
- ◆ Allow the TDM program, valet parking, shared parking and/or the employee van serving St. Francis to address any shortfall in parking rather than building additional parking.
- ◆ Develop an aggressive TDM program with “cash back” and vacation incentives.
- ◆ Provide a van and require employees housed in the proposed St. Francis Housing project to use the van for work related trips.

AA-207

#### Closing Comments

Cottage has clearly decided and it appears through the EIR process that the City has decided to rebuild in the Oak Park area. The decision to rebuild within an existing densely developed neighborhood with significant constraints cannot come without a price and that price is mitigation. Residents of the Oak Park neighborhood are being asked to make tremendous sacrifices and withstand years of adverse conditions, and accept a degraded quality of life for the important benefit of providing state of the art medical services to the community at large. The residents will be subjected to significant noise, nuisance dust, street closures, utility interruptions and other impacts during 9 + years of

AA-208

constructions and following construction we will be subjected to significant helicopter noise, significant air pollutant emissions, significant traffic, loss of our mature tree canopy, and loss of our urban wildlife. We will be more apt to accept these sacrifices, and whole-heartedly welcome the new hospital, if we feel everything possible (not the minimum) is being done to mitigate these impacts.

If the city is willing to accept and allow the community benefits to be provided by the project to be borne on the backs of the Oak Park residents then the City and Cottage should be doing everything possible to compensate and provide practical mitigation to the oak park residents to make their continued existence in the neighborhood as tolerable as it possible can be.

This project should really be viewed as a partnership between, the hospital, the city and the Oak Park neighborhood. Lets do everything we can to make sure it the best project it can be for all the partners.

Sincerely,



Joddi Leipner  
2202 Parkway Drive  
Santa Barbara, CA 93105

AA-208

## AA. RESPONSES TO COMMENTS FROM JODDI LEIPNER

- AA-1 **Project Description Inadequacy.** The EIR preparers disagree with the commentator's opinion that the EIR project description is inadequate. EIR Chapter 3.0 (Project Description) contains 26 pages of text and 12 figures describing the proposed project in sufficient detail to evaluate significant environmental impacts in accordance with the requirements of CEQA.
- AA-2 **Project Description: Special Events.** Presently, the hospital has approximately 6,800 square feet of conference space, including a 4,000-square-foot auditorium. The proposed reconstructed hospital will include an auditorium complex of approximately 4,000 square feet within the main hospital facility. The hospital conference space has long been used for periodic staff and community classes. The project description does not include an increase in the number of special events, and there is no additional area being dedicated to such uses as part of their proposal. The traffic analysis was based on actual trip counts and therefore included consideration of trips associated with group events.
- AA-3 **Project Description: Knapp Building.** The Knapp building is a two-building support facility for SBCH. The main building, fronting Bath Street, has historically housed administrative functions such as Finance, Patient Business Services, Human Resources, Development, Public Affairs, and Human Resources. The Information Systems Department and the Computer Operations Center are housed in the smaller of the two buildings, which is adjacent to the public alley. The Knapp Building is currently undergoing a remodel to provide physician offices, ADA upgrades, the maintenance of an on-site employee health service, and the relocation of the existing Eye Center. The building will continue to house the Computer Operations Center, Information Systems Department, and the Employee Health Department, as well as two physician office suites and the Eye Center (currently located on the main hospital property). The physician offices would be occupied by physicians, which are currently located within the adjacent hospital community. A total of 112 administrative employees have been relocated to a facility in Goleta. The number of employees that would occupy the Knapp building after the remodel would be 54.
- The Fletcher Building and Outpatient Surgery Building, which are owned by Cottage Hospital, are not included in the project site and Specific Plan boundary and therefore not included in the EIR analysis.
- AA-4 **Project Description: Remaining Six-Story Hospital Structures.** Presently, the six-story hospital element that would be retained and not retrofitted as part of the project contains acute care services. These services would be relocated into the new structurally compliant hospital facility once completed. The vacated space will be remodeled for non-acute care functions that primarily consist of administrative and support services, as well as outpatient and laboratory services, which currently occupy the existing hospital.

The type of services and clinical programs of the new facility are expected to remain essentially the same, although the increased facility size would allow for improved efficiency and intensity of use and expanded outpatient services to accommodate estimated future volumes of patients.

- AA-5 **Project Description: Oak Park.** The project description describes the properties and uses within the project site and Specific Plan boundary. CEQA Section 15124 only requires the precise location and boundaries of the proposed project. Therefore, the project description need not include and describe all properties within the Oak Park neighborhood that are owned by Cottage Hospital. However, the project plans for the project include Sheet G-1, which depicts other properties in the area that are under the hospital's ownership.

Other Cottage Hospital facilities in the area will continue to operate under the provisions and permits required by the zoning designation in which they are located. Because the Knapp Building property (2400 Bath Street) will include the proposed Knapp parking garage, it was determined that the entire parcel should be within the Specific Plan boundary, rather than apply the SP-8 zoning on the portion containing the parking structure, resulting in split zoning.

The Rehabilitation Institute is not proposed to be included in the Specific Plan boundary, and as such will retain the C-O zoning designation. The Rehabilitation Institute will continue to operation under its current land use entitlements, including a Conditional Use Permit.

- AA-6 **Project Description: Operations, and Staffing.** The hospital operates 24 hours per day, 7 days per week. Page 3-3 of the EIR identifies the current number of full-time equivalent (FTE) employees as 1,666, with a maximum 856 FTE on site at any given time. Cottage Hospital is an existing facility with variation among shifts. Some shifts are 12 hours, while others are 8 hours, and not all commence at the same time. Shifts vary from department to department, which results in the overlapping of general shift times. Actual traffic counts were undertaken for the project, and a trip generation methodology was customized to accurately represent the hospital use. In the Lead Agency's view, the use of baseline counts and customized trip generation represents reasonable worst-case assumptions for impact evaluation.

- AA-7 **Project Description: Departments, Services, Staffing.** The EIR preparers disagree with the commentator's opinion that the EIR project description of services and staffing is inadequate. EIR Chapter 3.0 (Project Description, page 3-1) provides the information cited by the commentator, including existing and proposed square footage, departments, services, and employees. The increased square footage and the projected future levels of service and staffing were identified by hospital professionals and consultants knowledgeable in hospital operations and trends, demographic trends, and OSHPD requirements, and these represent reasonable worst-case assumptions for evaluating environmental impacts under the provisions of CEQA. The EIR analysis identifies increases in service levels (such as outpatient services), increases in staffing, and associated environmental impacts.

- AA-8      **Project Description: Garage Operations.** The EIR evaluates the project proposed by the applicant. Current off-and on-street parking facilities are described in the project description and transportation/circulation chapters. The proposed project does not specify details about manned versus unmanned operations or charging of fees. The EIR does not identify environmental impacts that would require specification of manned or unmanned garage operations. Traffic Mitigation Measure TRF-3 would provide for establishment of a parking cash-out program, whereby parking fees would be charged and employees would have the incentive of receiving the cost of parking fees back in cash if they opt to use alternative transportation and thereby reduce traffic trips.
- AA-9      **Project Description: Specific Plan.** The EIR preparers disagree with the commentator's opinion that the level of detail of the Specific Plan project description is inadequate. As a planning tool, a specific plan may involve different levels of complexity. The proposed specific plan for this project is limited in scope to the project property. The basic development standards proposed for the Specific Plan are identified in the EIR project description (please see Table 3.C, Specific Plan Development Standards) and accompanying text, and these are adequate for purposes of environmental impact analysis. The EIR evaluates environmental impacts of the Specific Plan and a reasonable worst-case assumption of maximum build-out under the Specific Plan for both long-term and construction-related impacts. As contemplated in CEQA, an environmental impact report is an informational document that informs the development of a planning document in an iterative process. Additional development standards stemming from the analysis of impacts and mitigation may be considered by decision-makers for inclusion in the Specific Plan.
- AA-10     **Suggested Project Description Changes.** The commentator does not identify what suggested changes to the project description discussed by the Planning Commission and/or the Architectural Board of Review raise concerns about increased visual and noise effect; therefore, no specific response is possible.
- AA-11     **Project Description: Maps.** The EIR preparers disagree with the commentator's opinion that the EIR project description maps are inadequate with respect to the surrounding area for purposes of evaluating visual, land use, and helicopter operations. A detailed evaluation of bulk, scale, visual, and use compatibility of the proposed project, including the Pueblo parking structure, is provided in the visual resources aesthetics and lighting section of the EIR (Chapter 16.0), based on project plans and photo simulations that identify both project massing and architectural style from numerous representative locations in the surrounding area. In addition to information and analysis provided in the EIR, the City has an extensive design review process for evaluating bulk, scale, and neighborhood compatibility of projects. Both the Planning Commission and the Architectural Board of Review have conceptually reviewed the size, bulk, and scale of the hospital project, including the Pueblo parking structure, in accordance with City design review guidelines, which is reflected in the EIR. Further determinations on project size, design, and compatibility will be made by the Planning Commission, City Council, and Architectural Board of Review in their subsequent actions on the project. The EIR

evaluates the impacts of helicopter operations on the neighbors in the sections on hazards (Chapter 9.0), noise (Chapter 11.0), and visual aesthetics and lighting (Chapter 14.0).

**AA-12 EIR Scoping Comments.** It is the Lead Agency's (City's) responsibility to determine the EIR scope of analysis. In accordance with CEQA's requirements for public consultation, the City prepared an Initial Study, released an EIR Notice of Preparation for 30-day public review, and held a public scoping hearing. In determining the EIR scope of analysis, City staff and the EIR preparers thoroughly reviewed the commentator's prior letter and hearing testimony during the EIR scoping process and considered the comments along with all other public comments received during the EIR scoping period. The EIR addresses environmental issue areas raised in public scoping comments, and areas of controversy are summarized. Mitigation measures recommended in public comments were included as determined applicable or feasible in the DEIR. The public scoping comments are part of the record, were provided to decision-makers, and are available for public review upon request. CEQA and the CEQA Guidelines (Title 14, CCR) do not require that the public comment letters from the EIR scoping process be published in the Draft EIR. The CEQA Guidelines do provide direction for limiting the size of EIR documents.

**AA-13 Environmental Baseline Assumptions.** The EIR identifies as information that the SBCH is currently licensed by the State of California for up to 456 beds. The EIR impact analysis does not use the licensed bed count as the environmental baseline against which project impacts are compared. Project impacts are identified compared to existing conditions.

As described in the EIR and Topical Response 1, project traffic impacts were evaluated by identifying a patient trip generation rate based on existing patient volumes and existing hospital traffic volumes, and the rate was then applied to projected future patient volumes. Mobile air quality emission and traffic noise impacts were identified based on traffic calculations. Water demand, sewage generation, solid waste generation, and energy consumption volumes were identified based on rates derived from existing volumes and applied to project conditions. School impacts were evaluated based on net increase in employees over existing levels. Biological, cultural, geophysical, hazard, hydrologic, noise, and visual impacts were identified based on the net physical changes between the existing facility and the proposed new facility, and on construction-related impacts.

EIR Chapter 3.0, Project Description, Section 3.1, Existing and Proposed Patient Volumes and Services, describes the bed count and occupancy information:

*SBCH is currently licensed by the Department of Health Services (DHS) for 456 licensed beds..... Current and projected inpatient volumes are approximately 226 patients per day, including continuation of the increased volumes due to the closure of St. Francis (Medical Center). Outpatient volumes are projected to continue increasing, with a continued growth rate of two percent per year. This increase would add approximately 22,000 patient visits annually, or 60 patient visits per day.*

Section 3.4, Project Description-Hospital Facilities states:

*The proposed project would reduce the number of licensed beds at the hospital from 456 to 337 (317 acute care beds and 20 psychiatric beds).*

The commentator's opinions regarding application of CEQA guidelines and case law are acknowledged. Please also refer to Response to Comment G-120.

- AA-14     **Noise Impacts.** The EIR evaluated long-term operational noise effects (including parking structure noise, helicopter noise, and mechanical equipment noise) both in terms of effects to daily average ambient noise levels in accordance with adopted City impact significance thresholds and also in terms of maximum noise levels and community annoyance experienced at the time of intermittent noise events using the State's Model Community Noise Control Ordinance and the FTA's Groundborne Noise and Vibration Impact Criteria. As discussed in the EIR noise analysis (Chapter 11.0), noise effects from parking lots were found to be adverse but not significant, and impacts from two helicopter flights in a single night were found to be significant. A mitigation measure is identified to limit nighttime helicopter flights to emergencies only, which would reduce this potential noise effect.
- AA-15     **Noise Mitigation with Double Paned Windows.** The commentator's suggestion that the project be required to install double-paned windows on homes impacted by construction and helicopter noise is noted and will be forwarded for decision-maker consideration. The EIR did not identify this as a feasible mitigation, as installing such windows in all homes within audible range of helicopter and construction noise would be prohibitively expensive.
- AA-16     **Land Use Compatibility: Quality of Life, Property Values.** The commentator's opinions that the project will generate significant compatibility impacts, degrade quality of life, interfere with use and enjoyment of property, potentially damage property, affect health, and diminish property values for residents of the neighborhood, and that adequate mitigation has not been identified, are noted and will be forwarded to decision-makers.

CEQA requires the analysis of potential physical impacts on the environment from a proposed action. "Quality of life" is not a specific physical effect and is outside the scope of the EIR analysis. CEQA (Section 21080(e)) and the CEQA Guidelines (e.g., Section 15131) and established appellate case law in California interpreting CEQA have made it clear that CEQA does not require analysis of potential project effects that do not result, directly or indirectly, in a "physical change" to the environment. However, the EIR does evaluate physical environmental effects that may be associated with land use compatibility and quality of life considerations, including air quality, noise and vibration, traffic, circulation, parking, and visual effects, and identifies feasible mitigation measures to reduce both significant and adverse but less than significant environmental impacts.

Potential effects on property values is also not a physical environmental effect, but a socioeconomic effect, and is outside the scope of the EIR analysis. The CEQA Guidelines provide that socioeconomic issues may be considered if they would cause a

physical environmental effect. No socioeconomic effects of the project are identified that would result in adverse physical environmental effects. With respect to quality of life issues and socioeconomic effects, the hospital reconstruction would result in beneficial socioeconomic effects from improved and seismically-compliant hospital facilities, to the benefit of the Oak Park neighbors and well as the rest of the City and region.

Socioeconomic effects may also be considered under CEQA in determining the significance level of environmental effects. The EIR already identifies physical environmental effects as significant and unavoidable, including air quality, noise, and transportation effects.

It is noted that property values are a function of ever-changing market conditions involving many variables. City of Santa Barbara property owners enjoy a positive situation with respect to property values. Due to a continued perception of relatively positive environmental, economic, and quality of life conditions in the City and continued high demand for property, property has continued to maintain and increase in value over time throughout the City, including in the Oak Park neighborhood. There is no evidence of reduced property values next to other large construction projects in the City.

The information and analysis in the EIR, along with other information in the record from the staff report and public comment, will be considered by the decision-makers in balancing among sometimes competing project and neighbor objectives, and differing opinions about compatibility and quality of life issues, in taking action on the project proposal.

AA-17     **Land Use Impacts.** The commentator's opinion that significant land use impacts result when the individual issue area impacts are considered on an additive basis will be forwarded for decision-maker consideration. The EIR analysis finds that the proposed project does not cause a significant land use impact as identified in CEQA, in that it does not physically divide an established community, it is potentially consistent with applicable land use plans, policies, and regulations; and it does not conflict with any habitat conservation plan or natural community conservation plan. The EIR also found the project is consistent with the General Plan land use designation. The EIR does identify significant air quality, biological, noise, and transportation impacts, and evaluates cumulative environmental effects within each topical section. The information in the EIR serves to inform the public and decision-makers about physical environmental effects prior to planning and land use decisions on the project.

AA-18     **Rezone from Medical Commercial to Hospital.** The commentator's opinions that the EIR does not evaluate impacts of the rezone and requesting maintenance of a CUP requirement for the hospital will be forwarded to the decision-makers. SBCH is proposing a Specific Plan as part of the project. As such, SP-8 would become the zoning for the Specific Plan boundaries (also the project site) and would establish development standards and regulations to govern the development of the Specific Plan land use areas. Each topical section of the EIR evaluates the long-term and construction-related physical environmental effects of establishing the Specific Plan and maximum build-out of the Specific Plan uses under reasonable worst-case assumptions.



Much of the commentator's commentary regarding the merits and drawbacks of using various planning permits is a planning and policy matter outside the scope of the EIR. Further discussion of planning and permitting issues will be provided in the staff report. In summary, City staff notes that SP-8 would acknowledge that the hospital facility and its ancillary uses are appropriate, would be allowed by right, and are not considered a conditional use. Cottage Hospital has existed in this area since the 1800s, prior to some of the residential and medical uses in the surrounding area. Because of its more unique use, it is appropriate to create zoning that recognizes the hospital as an allowed use, rather than requiring a Conditional Use Permit (CUP) to operate. Additionally, the General Plan recognizes the hospital as an important community resource and acknowledges the need to provide sufficient land in order to allow the hospital facility and associated medical uses to expand. The commentator is correct that the decision-makers would make Development Plan findings prior to an action approving the project. The decision-makers are not precluded from revising or adding to the findings as appropriate. It does not follow that because the planning permit structure is changed, decision-makers would no longer consider all relevant issues pertaining to a land use decision, including public peace, health, safety, comfort, general welfare, and property values of the neighborhood.

- AA-19     **Visual Impacts.** The commentator's opinions regarding the significance of the project's visual impacts are acknowledged and will be forwarded to the decision-makers for their consideration during consideration of the proposed project. The visual impact analysis conducted for the EIR disclosed the conditions and project changes cited by the commentator, including size, height, and vegetation changes and incorporated these conditions and project features into the view simulations provided in Chapter 14.0 of the EIR. Based on review of the project design plans and the visual simulations, the EIR concluded that the visual impacts of the proposed project associated with increased size, bulk, and scale and view blockage would be adverse but less than significant and further minimized with implementation of the proposed Landscape Plan. The project would have beneficial aesthetic impacts associated with improved architectural and landscape design.
- AA-20     **Loss of Protected Trees.** The project proposes to retain all the trees so identified on the plans. Mitigation Measure B-10 provides for extensive procedures to protect trees during construction. Mitigation Measure B-10 proposes that protected trees that are lost or substantially damaged during construction would be replaced at a ratio of 10:1, and Mitigation Measure B-12 provides for Oak Tree replacement measures. Mitigation Measure B-2 provides for postconstruction monitoring of retained and new trees. A standard condition generally applied would require maintenance of approved landscaping for the life of the project. The commentator correctly cites the analysis provided in the EIR related to the proposed project's effect on tree cover.
- AA-21     **Undergrounding of Transmission Lines: Tree Replacement.** The commentator's opinions about undergrounding for visual impact mitigation are noted and will be forwarded to decision-makers. Please refer to Response to Comment Y-5 regarding undergrounding of overhead utilities. The proposed project has committed to undergrounding overhead utilities in the immediate vicinity of the project area. Three

options are identified in the EIR for replacement of oak trees: (1) increase the number of oak trees in the Landscape Plan; (2) plant trees in an off-site City-owned park (such as Oak Park or Skofield Park); or (3) plant additional oak trees as street trees within the Oak Park neighborhood. The opportunity to plant replacement oak trees within the local streets in the Oak Park neighborhood has been identified as part of the mitigation for the proposed loss of oak tree impacts on site.

AA-22     **Cumulative Impacts.** The cumulative setting and pending projects considered in CEQA environmental review are those proposed at the time of the Notice of Preparation of the EIR. CEQA does not require that the analysis be continually updated through the environmental process to add additional projects, as is suggested by the comment. The CEQA Guidelines provide the following overall guidance for cumulative impact evaluation: “The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute . . .”

AA-23     **Goleta Valley Cottage Hospital.** As noted above, the cumulative setting and projects are established at the time of the Notice of Preparation. At that time, Cottage Hospital indicated that there was no plan or intent to close the Goleta Valley Hospital. There was no other evidence at that time on which to base an EIR analytic assumption on the speculative presumption that the Goleta Valley Hospital would close and all patients would be moved to Cottage Hospital. A project for seismic upgrade of the Goleta Valley Cottage Hospital is a different project of different scope at a different location within a different local jurisdiction than the Cottage Hospital project. It does not follow that if that project has not submitted permit applications at the same time as the Cottage Hospital project that it therefore cannot feasibly occur. Cottage Hospital has since announced that it will be proceeding with permit requests to seismically upgrade the Goleta Valley Hospital. It is also noted that the EIR considered the Goleta Valley Hospital within the Alternatives analysis: (1) Alternative 4b, Goleta Valley Cottage Hospital Property, and (2) Alternatives 4.d.iii and 4.d.iv, Combinations of Alternative Sites.

AA-24     **Cumulative Discussion of Past Actions.** A cumulative setting is generally established as the existing conditions occurring at the time the environmental analysis is commenced. The impacts of past projects are reflected in the baseline conditions, which are then added to the project and cumulative project impacts. The EIR analysis includes consideration of past actions and changes in the environmental conditions. Given the urbanized nature of the project study area, actions that have happened in the past are described as part of the baseline conditions. For example, redevelopment over time has altered the character of the uses within the Oak Park community, and these alterations are acknowledged in the discussion of existing surrounding land uses and the cumulative impact discussion in Chapter 14.0, Visual and Aesthetics. Similarly, vehicle trips associated with past actions are currently using the roadways within the project area and are considered part of the baseline conditions used to evaluate the cumulative traffic, noise, and air quality effects.

- AA-25      **Cumulative Visual Effects.** The EIR preparers disagree with the commentator's opinion and interpretation of CEQA requirements. Please refer to Response to Comment AA-24. Past "projects" that have changed environmental conditions are reflected in the existing baseline setting to which project impacts are added. The historic structures report section cited provides the history of the neighborhood as part of the historic resources analysis. Part of that history is the long establishment of the hospital as part of the land use and visual setting. The visual impact analysis recognizes past changes as part of the existing visual setting of the Oak Park neighborhood, including intensification of residential uses and conversion or replacement of existing residences to medical uses. The EIR evaluation provides detailed analysis supporting the conclusion that project and cumulative visual effects with respect to views, visual aesthetics and compatibility, and lighting would be adverse but less than significant. The project decision-makers will make final determinations about project design to minimize visual effects as feasible.
- AA-26      **Visual Mitigation Measures.** The commentator's suggestions for visual mitigation measures, including reducing visual clutter throughout the neighborhood by eliminating overhead transmission lines, consolidating and removing street signs, increasing green space along streets and adding street trees, improving the visual qualities of Mission Creek, and providing City funds to property owners to enhance the visual quality of their properties, will be forwarded for decision-maker consideration. The EIR visual impact analysis finds the project-specific visual impact and the project contribution to cumulative visual impacts within the Oak Park community as adverse but less than significant, and no mitigation measures are required. There is no nexus and proportionality between the environmental impacts of the project and the neighborhood-wide mitigation measures identified in the commentator's letter, and the cost of such neighborhood-wide measures would also be infeasible. The project would provide for utility undergrounding, street and landscape improvements, and tree planting around the property perimeter affected by the project, and EIR mitigation provides for some off-site replacement tree planting along streets and park areas in the neighborhood. Through the City's extensive project review and design review processes, the decision-makers will consider measures pertaining to utility undergrounding and landscaping as feasible to minimize project adverse but less than significant visual impacts and enhance project compatibility consistent with policies and design guidelines. Decision-makers may also consider project benefits in making findings of overriding considerations to deem significant impacts acceptable.
- AA-27      **Monitoring.** The final project design, including architecture and landscaping, remains subject to review and approval by the Planning Commission, City Council, and Architectural Board of Review. The hospital will be required to install and maintain both the hospital facility and parking structure properties according to the design and landscape plan approvals. Monitoring of compliance with project construction and conditions of approval will be provided by the Project Environmental Coordinator and City staff.
- AA-28      **Environmental Justice.** An analysis of Environmental Justice is required for projects with federal agency discretionary actions and/or funding as stipulated by the National Environmental Policy Act (NEPA). The proposed SBCH project application does not

have any federal discretionary actions and is not subject to NEPA. CEQA allows for discussion of social or economic effects of a project that may indirectly cause physical changes to the environment or to inform determinations of impact significance (see Response to Comment AA-16). Environmental Justice, as established by Executive Order 12898, provides that “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing as appropriate, high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations.” The Oak Park neighborhood does not contain disproportionate low-income or minority populations (including Native Americans), and no Environmental Justice effects would result from the project.

- AA-29     **Mitigation Test.** The Sundstrom case referenced precludes deferring CEQA impact analysis to a future study. That is not the situation here; the CEQA impact analysis has not been deferred, as the EIR identifies project impacts, mitigation measures, and appropriate residual impact significance levels based on sufficient evidence and in accordance with CEQA. Mitigation measures are identified in enough detail as part of the EIR to allow a conclusion about residual impact levels. Clearly CEQA does not preclude applying measures for additional future final plans, more detailed studies, and monitoring of activities and impacts. Monitoring in and of itself does not constitute mitigation and does not receive impact reduction credit in determining CEQA impact significance levels.

**Mitigation Measure N-2, Annual Helicopter Evaluation.** There are no changes proposed to Mitigation Measure N-2. The annual evaluations will be collected for informational purposes, and it is not anticipated that any actions will be taken subsequent to the submittal of these evaluations.

- AA-30     **Mitigation Measure N-8, Vibration Crack Survey.** Mitigation Measure N-8 has been refined to provide for crack surveys and video reconnaissance within 150 feet of the project perimeter prior to and following major phases of construction (four phases described in pages 3-20 through 3-24 of the EIR) as determined by the City and that SBCH would be responsible for compensation for structural damage. Please also refer to Response to Comment G-79 and AA-153, which indicates the revised wording of Mitigation Measure N-8. No change to EIR impact conclusions results.

- AA-31     **PF 9-2, Aircraft Safety.** Please refer to Response to Comments G-52 and Y-3, which address aircraft safety. The EIR identifies Project Features, which are components of the project that pertain to environmental impact and are reflected in the EIR impact analysis. PF 9-2, hospital identification of helicopter procedures and flight paths, is not a “mitigation measure”; it is a project feature that is part of the project description. This measure provides evidence of procedures to minimize flight hazards.

- AA-32     **Mitigation Measure HAZ-8, Helipad.** Please refer to Responses to Comments Y-3, which addresses aircraft safety, and G-52, which identifies refinements to Mitigation Measure HAZ-8. The impact analysis recognizes that Project Feature PF 9-2 is incorporated as part of the project description that provides helicopter safety procedures that largely minimize potential flight hazards from occasional emergency helicopter overflights. Mitigation Measure HAZ-8 provides for identification of final helipad design

plans, emergency response plans, and flight paths and approval by Federal, State, and local agencies in accordance with regulations designed to minimize hazards, which occurs following discretionary approval of the project by the City. Approval of final safety plans by City Fire and Police Departments are added by this measure. Application of this measure as a condition of approval provides for added monitoring.

- AA-33     **Mitigation Measures HAZ-10 through HAZ-12, Hazardous Materials.** All mitigation measures are implemented outside of the EIR review process following City discretionary approval of the project. The measures cited addressing potential asbestos, lead-based paint, and PCBs in existing structures proposed for demolition provide mitigation of potential exposure to the public or environment through identified regulatory processes designed to mitigate such impacts through specified procedures for survey, characterization, handling, and disposal of such materials. The EIR analysis properly identifies impact levels based on information about potential hazards and information, demonstrating the ability to reduce these potential hazards to less than significant levels through specified regulatory procedures.
- AA-34     **PF 10-6, Landscape Design for Water Quality.** PF 10-6 (Landscape Design for Water Quality) is not mitigation; it is a project feature that is part of the project description. The EIR water impact analysis recognizes that the project would provide an additional 69,000 square feet of landscaping at the site, designed to the extent feasible to capture and infiltrate flows. Mitigation Measure HYD-5 (Project Storm Water Management Plan) proposes that the project include site design best management practices to minimize the impervious area, which would include landscaping.
- AA-35     **Mitigation Measure HYD-10, Flood Hazard Reduction Plan.** The EIR impact analysis identifies the types of mitigation measures to be applied to adequately mitigate flood hazards during construction, and the City's General Standards for Flood Hazard are referenced. Mitigation Measure HYD-10 provides for refinement of such measures with final project design plans.
- AA-36     **Mitigation Measure TRF-8, Construction Management Plan.** The EIR impact analysis identifies potential project impacts based on a preliminary project construction phasing and traffic management plan and identifies measures to address pedestrian circulation (i.e., for construction Phase 1, pedestrian diversion to the north side of Junipero Street continuing on the east side of Bath Street, the north side of Pueblo Street, and the east side of Castillo Street to avoid conflicts with the construction work). Mitigation Measure TRF-8 provides for refinement of this pedestrian circulation plan based on final project construction phasing and operations plans. The EIR analysis contains sufficient information regarding pedestrian circulation to conclude that impacts to pedestrian circulation would be mitigable to less than significant levels.
- AA-37     **Standard Mitigation.** The commentator's opinion is noted and forwarded to decision-makers. The EIR provides extensive analysis of project impacts and identification of mitigation measures supporting impact significance findings. In many cases, standard mitigation approaches are identified. In some cases, standard mitigation language is customized for the project, or nonstandard mitigation is applied. In some cases, impacts

are found to be fully mitigated to less than significant levels. In other cases, impacts can only feasibly be partially mitigated and a residual significant impact is identified.

AA-38 **Clean Air Plan.** The EIR preparers disagree with the commentator's opinion that the project is inconsistent with the Clean Air Plan. As discussed in the EIR, project consistency with the Clean Air Plan (CAP), means that direct and indirect emissions associated with the project are accounted for in the CAP's emissions growth assumptions and cumulative air quality evaluation and plan, and that the project is consistent with policies adopted in the CAP. The hospital project is a modification of an existing facility that will provide medical service for existing and future populations accounted for in the CAP. Proposed additional project-generated traffic trips, such as for additional employees and intensified hospital outpatient operations, are within CAP growth projections and associated cumulative air quality analysis. As described in the EIR, the proposed project and mitigation measures propose to incorporate appropriate CAP Transportation Control Measures and applicable stationary control measures, and would be potentially consistent with APCD rules and regulations. The project also incorporates many of the CAP implementation strategies cited, as applicable and appropriate to the unique project use and specific circumstances, including the location of adequate centralized hospital facilities close to existing medical support facilities, measures to provide safe and efficient pedestrian and bicycle connections and encourage pedestrian, bicycle, and transit use, the mixing of compatible residential and medical uses, incorporation of on-site outdoor passive recreation, on-site day-care, on-site food service, on-site employee showers and lockers, and on-site bicycle parking, and provision of measures for managed vehicle parking supply. The Hospital is also embarking on a separate project to provide housing for hospital employees. Please refer to Response to Comment Y-6 regarding the potential for vanpools from the St. Francis housing site. The initial EIR policy consistency analysis identifies the proposed project as potentially consistent with the CAP. Final determination of project consistency with adopted plans and policies is the purview of City decision-makers.

AA-39 **City Transportation Policies.** The EIR preparers disagree with the commentator's opinion that the project is inconsistent with City Circulation Element policies. The EIR analysis recognizes both temporary construction-related effects and long-term effects to vehicle, bicycle, pedestrian, and transit circulation, traffic, and parking. With respect to the specific Circulation Element policies cited by the commentator, Cottage Hospital has included project features that support a consistency finding with the goals and policies of the Circulation Element. The EIR also includes mitigation measures that support consistency with Circulation Element policies. The project potentially meets Goals 2, 3, 4, 5, 6, and 7 and associated policies and implementing strategies by providing the following features: transit stops directly adjacent to the project site, a bicycle station proposed in the Pueblo parking structure, showers and lockers for the employees, handicap ramps at the intersections adjacent to the hospital, intersection improvements at the intersections adjacent to the hospital as well as others in the surrounding area to improve pedestrian circulation, two main entrances to facilitate access and circulation, widened sidewalks around the periphery of the hospital, a parking cash-out program to provide an innovative parking management strategy, and the continuation of the Cottage Hospital Transportation Demand Management (TDM) program. The existing TDM

program includes a TDM coordinator who oversees the program, a rideshare and carpool program, an employee alternative transportation bulletin board where a variety of information is displayed, employee commuting awards, and Clear Air express and MTD subsidies. Measures to improve area intersections are also identified as mitigation to partially offset identified traffic effects of the project in support of Circulation Element traffic level of service standards. The EIR initial policy consistency analysis finds the project to be potentially consistent with the City Circulation Element. The decision-makers are responsible for a final determination on consistency of the Hospital project with the Circulation Element.

AA-40 **Recirculation of EIR.** Section 15088.5 of the CEQA Guidelines provides for a lead agency to recirculate a Draft EIR if there is substantial new information as follows:

“...(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance. (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.

A Draft EIR must also be circulated if it is “so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

“Re-circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

The City and EIR preparers have carefully considered the comments received and additional information provided and have concluded that none of the comments or responses to comment on the EIR would meet the above recirculation criteria, and re-circulation is not required.

AA-41 **Trauma Criteria.** Trauma is defined as an injury caused by an external force to the body. There are standard protocols set in place by the American College of Surgeons Committee for trauma care. Hospitals are set up for a certain level of care for traumas and ranked on the intensity of care they can provide 24 hours a day. The hospital Trauma Center is currently Level II and is proposed to remain a Level II at the completion of the project. The California Code of Regulations (CCR Title 22) does not specify that trauma centers need to have aircraft transportation for emergency services. However, SBCH was granted Level II status in 2001 with the previously planned and City-approved heliport referenced. Survival rates for trauma patients are highly correlated with timely access to designated trauma centers. The new helipad would improve health care services by assuring access to this level of care and life-saving efficiency for the entire Central Coast.

AA-42 **Baseline: Licensed Bed Count.** The commentator’s opinion is noted. Please refer to Response to Comment AA-13 regarding baseline.

- AA-43     **Employee Shifts.** The commentator's opinion is noted. Please refer to Response to Comment AA-6 regarding the number of employees per shift.
- AA-44     **Objective of Hospital Expansion.** To clarify this issue, the discussion is revised to state the following: The types of services and clinical programs of the new facility are expected to remain essentially the same, although the increased facility size would allow for improved efficiency and intensity of use and expanded outpatient services to accommodate estimated future volumes of patients.
- AA-45     **Existing Setting/Land Use Area C.** The paragraph cited provides summary information regarding existing land uses within Area C. The commentator's opinions regarding the purchase of properties by the hospital in anticipation of expansion are noted but are not pertinent to the EIR analysis. The reference to the residences located on Oak Park Lane and Los Olivos will be removed, as they are not within Land Use Area C. The residences on Parkway Drive are also not within Land Use Area C of the Specific Plan boundary.
- AA-46     **Existing Setting/Surrounding Land Uses.** Section 3-3, Surrounding Land Uses, provides summary information describing the types of land uses surrounding the project site, including medical, residential, commercial, and park uses. The EIR also provides numerous maps, plans, and photographs that describe the surrounding area setting, and the existing setting is described as appropriate in the various environmental sections sufficient to evaluate impacts. The EIR preparers disagree with the commentator's opinion that more detailed information is required. Additional discussion of zoning issues will be provided as part of the staff report for the project.
- AA-47     **Project Merits.** The commentator opinion expressing disappointment that the hospital project does not provide underground parking and workforce housing and reduce reliance on single occupancy vehicle trips is not a comment on the EIR analysis. These comments will be forwarded to the decision-makers for consideration.
- AA-48     **Project Description: Specific Plan.** The commentator's opinions about the Specific Plan are noted and will be forwarded to decision-makers. Please refer to Response to Comment AA-9 regarding inclusion of measures in the Specific Plan to address environmental effects to the neighborhood. The objective of SP-8 is to establish allowable land uses, development intensity, and development standards to guide the future development of the SP-8 areas. The Specific Plan currently provides language aimed at protecting the adjacent residential land uses, and additional measures could be added at the discretion of the decision-makers. This EIR section discusses protection of surrounding residential land uses.
- AA-49     **Project Description: Specific Plan, Pueblo Garage.** The commentator's opinions about what the Specific Plan must do are noted and will be forwarded to decision-makers. The Draft EIR identifies noise, air quality, and nighttime lighting effects associated with operation of the Pueblo parking structure as less than significant impacts to adjacent land uses. Land Use Area C does not contain residential uses. As proposed by SP-8, the maximum height limit for Land Use Area C would be 45 feet, consistent with the height limit of the current zone (C-O). The minimum structural setback requirement proposed



for all land uses is 10 feet unless otherwise indicated. The hospital project proposes to provide structural setbacks to the nearest residences far exceeding the proposed minimum setback standard. The Specific Plan will be considered by the Planning Commission and City Council and therefore is subject to change at their discretion.

- AA-50 **Project Description: Specific Plan, Open Space, Child Care.** The commentator's opinions regarding Specific Plan development standards are noted and will be forwarded to decision-makers. Table 3.D of the EIR identifies the total landscaping area proposed by the project within Land Use Area C to be 0.8 acre, which exceeds 20 percent of the total acreage (2.41 acres) for Land Use Area C. Please refer to Response to Comment AA-49 regarding proposed setback and height standards for Land Use Area C.
- AA-51 **Project Description: Proposed Patient Rooms.** The EIR is correct that 310 patient rooms are proposed. There will be a total of 310 in-patient rooms, including 283 private rooms and 27 semi-private rooms. Refer to Response to Comment G-12 regarding the bed occupancy rates. According to recent information, GVCH is not proposed to close.
- AA-52 **Project Description: Table 3.D Statistical Summary, Area.** Table 3.D is intended to show the acreage/square footage that proposed uses would occupy within each Specific Plan Land Use Area. As shown in Table 3.D of the EIR, the square footage for the child care facilities is 11,813 square feet (Area C), 58,280 square feet for the Pueblo parking structure in Area C, and 33,722 square feet for the Knapp parking structure (Area B).
- AA-53 **Project Description: Hospital Facilities.** This section of the EIR is describing the hospital facility project description and not comparing the Specific Plan with the C-O zone.
- AA-54 **Project Description: Helipad and Elevator Tower.** It is the commentator's opinion that the project description has not provided an adequate description of the proposed helicopter flight path. Page 3-14 of the EIR describes the flight paths that would be taken under normal as well as windy conditions, and the EIR includes Figure 3.5, which graphically depicts both flight paths. The medivac helicopters and airplanes are expected to be operated by Mercy Air and Cal-Star. Mercy is based out of Oxnard and Cal-Star is based in Santa Maria. The paramedic is responsible for determining how to get the patient to the appropriate level of care. The EIR generally describes the flight approaches and departure routes under normal weather and windy conditions. The final helicopter operations plan will identify the general windspeed standard; however, pilots will retain a degree of discretion. The regular flight approach would be expected to be used in the great majority of instances, and the windy day alternate route would be used infrequently. No reliable information is available that accurately estimates the predicted number of windy days in the future that would trigger use of the alternate route. The helicopter service companies and pilots are responsible for using designated flight paths with oversight by the Federal Aviation Administration and Caltrans. A point of contact for reporting violations would be identified.
- AA-55 **Project Description: Elevator Tower Height.** The proposed height of the tower design is driven by a combination of functional and aesthetic considerations. The tower height is

mainly to fulfill the vertical transportation system clearance requirement. The architectural spike and the sloping tile roof sitting on top of the elevator machine room are included in response to aesthetic design direction from the Architectural Board of Review. The proposed helistop floor elevation is at EL 201.50 feet, and the elevator machine room floor elevation is at EL 219.50 feet. This would provide an 18-foot floor-to-floor height to fulfill the minimum 17 foot-6 inch elevator shaft overrun clearance. The elevator machine room requires another minimum height clearance of 10 feet. The 1:3 ratio sloping tile roof (the steepest slope recommended by ABR) sitting on top will bring the height up to approximately EL 238.00 feet to the base of the turret. That will be approximately 26 feet, 6 inches, above the finish level of helistop.

- AA-56     **Project Description: Parking Spaces.** Seventy-five of the existing hospital parking spaces are allocated by prior agreement to the Rehabilitation Institute, Human Performance Center, Rogers Medical Offices, Paveloff Clinic, and Fletcher Building. The parking spaces associated with the Fletcher Building have been included in SBCH parking supply numbers because the services currently located in the MRI building are relocating into the Fletcher Building. Since those employees are included in the EIR analysis, it was determined that the parking would be included as well. The Outpatient Surgery is an independent use and not part of the hospital's proposal; therefore, the parking for the Outpatient Surgery was is not included.
- AA-57     **Project Description: Pueblo Parking Structure.** The EIR project description and impact analysis contains all the information cited by the commentator. The square footage of the Pueblo structure footprint, as noted in Table 3.D is 58,280 s.f. The total s.f. of floor space on the three-story structure is 208,000 s.f. The description of the proposed Pueblo parking structure includes the setbacks of the structure from adjacent residences at the end of the same paragraph. The height of the proposed structure is identified in the same paragraph as 27 feet (and the massing is shown in Figures 3.4, 3.6, 3.8, and in the visual/aesthetics figures in Chapter 14.0 from selected vantage points [Views 1, 2, 5, 8, and 9]).
- AA-58     **Project Description: Pueblo Parking Architecture.** The summary description of the Knapp and Pueblo parking garages in the section cited is that the structures would be Spanish in style but simplified. The Architectural Board of Review (ABR) has conceptually reviewed the design and found the architecture of this structure conceptually acceptable for the type of structure and location per City design guidelines. The Pueblo parking structure architecture will also be subject to subsequent preliminary and final design review by the ABR following discretionary approval of the project by the Planning Commission and City Council.
- AA-59     **Project Description: Parking Structure Use.** As analyzed by the Draft EIR, the parking demand for the project would be approximately 1,359 spaces. To accommodate this parking demand, the hospital project proposes two parking structures, which would serve the majority of the project's parking demand. The Pueblo parking structure would provide 635 spaces and the Knapp parking structure would provide 556 spaces. The remaining spaces would be provided both on-street and within surface parking lots. The Pueblo parking structure is proposed to be a mixed facility, with public and some

employee parking, and the Knapp structure is proposed to be exclusively for hospital employees. Although the Pueblo parking structure is intended primarily for public use, it would also be made available to hospital night shift employees.

- AA-60 **Project Description: Garage Setback to Residential.** The commentator is correct that the closest residential property to the proposed Pueblo parking structure is less than 95 feet. The project architects have confirmed that the closest distance from the Pueblo parking garage to the nearest residentially zoned property is approximately 72.6 feet. This clarification is added to the project description text.
- AA-61 **Project Description: Child Care Center.** The child care center hours of operation are proposed to be from 6:30 a.m. to 5:30 p.m. As noted in the paragraph cited, the preschool building would be one story. The maximum height of the facility is the small conical tower at the administration building, which at its peak is 20 feet. The highest regular roof is 18 feet at its ridge, which is the preschool building. This clarification is added to the project description text.
- AA-62 **Project Description: Infrastructure Relocations and Service Interruptions.** Please refer to Project Feature 12-7, which states that new utilities and existing aboveground utilities will be located underground as part of project development, and that utility undergrounding activities will be coordinated with the utility providers to ensure that no interruption of service to adjoining utility customers occurs. City staff will propose conditions providing that disruption of power service to surrounding neighbors be avoided or reduced to the maximum extent feasible as determined by Southern California Edison.
- AA-63 **Project Description: Undergrounding of Utilities.** The commentator opinion that overhead facilities must be undergrounded throughout the Oak Park Neighborhood is noted and will be forwarded for decision-maker consideration. Please refer to Responses to Comments Y-5 and AA-26.
- AA-64 **Project Description: Landscaping.** Please refer to Table 3.D on page 3-12 of the Draft EIR. This table breaks down the public and private open space area (landscaped areas, both hardscape and softscape) for all Land Use Areas of the Specific Plan. It also provides a breakdown of acreage and square footage associated with the open space for all areas. All areas exceed 20 percent in the landscaped/open space area. Note that the City would not require open yard areas beyond the front and side yard setbacks in commercially zoned areas. Existing green space and public visibility and accessibility is shown on Figure 3.2, the aerial photograph of existing green space. Proposed green space and its public visibility and accessibility is depicted on Figure 3.6, the project Conceptual Landscape Plan. Trees, landscaping, and wider public walkways are proposed around the entire perimeter of the project, which would be visible and accessible to the public. Other aspects of the interior landscape and open space plan, including a garden at the corner of Pueblo Street and Oak Park Lane, courtyards, landscaping, and water features, are described further in the EIR project description. The hospital would continue to be a private, nonprofit medical facility, and interior open spaces are intended for hospital patients, visitors, and employees, not to provide public open space.

- AA-65     **Project Description: Tree Protection.** Please refer to the Biological Resources impact analysis in Chapter 6.0, which discusses potential impacts to existing trees proposed to be retained. All trees proposed to remain will be protected during construction. Please refer to Mitigation Measure B-10, which provides for tree protection measures during construction and tree replacement in the event that any trees do not survive construction activities.
- AA-66     **Project Description: Demolition and Construction Noise.** Please refer to Topical Response 3 regarding construction noise and hours limitations and the EIR Chapter 11.0 analysis of noise impacts. The commentator's opinions regarding construction noise are noted.
- AA-67     **Project Description: Staging Areas.** During some phases of construction, it would not be feasible to locate staging areas away from residential uses. The commentator is correct that the staging area for the Pueblo parking structure is proposed to be located where the new child care facility is being proposed and not where the current child care facility exists. Please refer to Mitigation Measure N-11 in the EIR noise analysis (Chapter 11.0), which requires the installation of noise barriers during construction to lessen construction noise effects (including staging areas).
- AA-68     **Project Description: Construction Management Plan.** The commentator's opinions for inclusion of specified measures in the construction management plan are acknowledged and will be forwarded to the decision-makers for consideration.
- AA-69     **Project Description: Development Agreement.** A development agreement is a legal mechanism proposed for the SBCH project to assure that laws and regulations that are in place at the time of project approval would apply throughout the construction timeframe of estimated nine years and to provide assurance to the City that the project would be constructed in a timely manner. The EIR preparers disagree with the commentator's opinion that further details of the development agreement are necessary in the EIR project description. No additional significant environmental impacts would result from the development agreement.
- AA-70     **Project Description: Figure 3.4, Site Plan.** Comment noted. The residences located on Parkway Drive and Los Olivos Street are shown on Figures 3.2 and 3.3.
- AA-71     **Project Description: Conceptual Landscape Plan.** The image provided in Figure 3.6 is a reduction of the full-size Conceptual Landscape Plan. The full-scale Landscape Plan identifies species to be retained, transplanted, or proposed within the project site, and sizes of replacement trees. The full-scale Conceptual Landscape Plan is available for review at the City Community Development Department, Planning Division. The proposed species list for the conceptual landscape plan is included in the FEIR as Table 3.H following the Conceptual Landscape Plan. The landscape plan will be subject to subsequent discretionary approvals by the Planning Commission, City Council, and Architectural Board of Review. Please refer to Response to Comment G-113 for a further discussion of the sizing of replacement trees.

- AA-72 **Project Description: Conceptual Lighting Plan.** Please refer to Chapter 14.0, Visual Aesthetics and Lighting, for analysis of project lighting effects. Please also refer to Response to Comment G-109 regarding lighting in the Pueblo parking structure.
- AA-73 **Project Description: Figure 3.11, Demolition Areas.** The structures located in the rear yard setback of Lot 3 and the Maseda property are proposed to be demolished as part of the project. The entire area would be cleared for construction.
- AA-74 **Land Use/Policy Consistency.** The commentator's opinion regarding characterization of proposed zoning/permitting changes is noted and will be forwarded for decision-maker consideration.
- AA-75 **Land Use/Policy Consistency: Specific Plan.** Comment noted regarding the commentator's intent to submit recommended changes to the proposed Specific Plan.
- AA-76 **Land Use/Policy Consistency: Pueblo Garage Setback.** Approximately 67 linear feet of the Pueblo parking structure is proposed to be set back 4 feet, 11 inches. This portion of the structure is located on the southern elevation of the building abutting the rear of the multifamily complex located on 2220 Oak Park Lane. Additionally, the project plans depict the 4-foot, 11-inch setback portion of the proposed Pueblo parking structure's southern elevation.
- AA-77 **Policy Consistency: LUE, Trees.** The commentator's opinion regarding project inconsistency with policy is noted and will be forwarded for decision-maker consideration. As noted, the EIR impact analysis recognizes that mature trees would be removed by the project and it would take time for new trees to mature and a change in tree cover. There would be a net gain of approximately 95 trees. The EIR also includes a mitigation measure that would require the replacement of trees if they do not survive during construction, and in the case of the oak trees, five years after planting. Additionally, the project would be required to provide landscaping and maintenance for all project areas. The project's Preliminary Landscape Plan has been reviewed by the ABR, the Street Trees Committee, and the Parks and Recreation Commission and found to be acceptable. The EIR's initial project consistency analysis finds that the project could be found consistent with Land Use Element policies requiring landscaping and maintenance in all developments as well as limiting the removal of substantial trees to the extent feasible. The decision-makers will make final determinations regarding project consistency with policies.
- AA-78 **Policy Consistency: LUE, Trees.** The commentator states that to be consistent with the Land Use Element's policy requiring landscaping and maintenance in all development and limiting the removal of substantial trees, the project must replace trees with a significant size of 15-gallon, 24-inch box, and every opportunity should be taken to replace trees directly within the Oak Park neighborhood. Mitigation Measure B-9 would require that trees be replaced with a minimum 15-gallon container size. The EIR also indicates that the majority of replacement trees would occur within the project site or Oak Park neighborhood.

- AA-79     **Policy Consistency: LUE, Air Pollution.** Please refer to Topical Response 6 regarding the revised parking demand analysis. The parking demand has been recalculated in the FEIR, and Mitigation Measure TRF-4, which required 48 additional spaces, is no longer needed to meet the project's parking demand. Please refer to Response to Comment AA-56 regarding Fletcher Building and Outpatient Surgery parking. SBCH proposes to continue its extensive TDM program. Mitigation Measure TRF-3 identifies implementation of a cash-out parking program designed to provide incentives to reduce employee trips and parking demand.
- AA-80     **Policy Consistency: LUE, Noise Pollution.** The commentator's opinion that construction noise must be limited on evenings and weekends to be consistent with policy is noted and will be forwarded to decision-makers. Please refer to Topical Response 3 regarding construction noise/hours limitations. As part of their consideration of the project, the decision-makers will determine whether the project is consistent with the goals and policies of the General Plan and Zoning Ordinance.
- AA-81     **Policy Consistency: LUE, Building Heights, Visual Effects.** The commentator's opinion that the Specific Plan and zone change would not be consistent with the referenced policy on building heights is noted and will be forwarded to decision-makers. Sixty-foot building heights are allowed by the City Charter. The proposed 60-foot building heights for Land Use Area A (main hospital facility) would be allowed through the establishment of the SP-8 zone. The initial EIR policy consistency analysis finds that this change could be found consistent with the Land Use Element policies. Final policy consistency determinations will be made by the decision-makers. The EIR concludes that visual aesthetic impacts associated with the project would be less than significant, and mitigation is not required. Please refer to Response to Comment Y-5 regarding undergrounding of utilities by the project.
- AA-82     **Policy Consistency: LUE, Historic Resources.** It is not the case that the referenced EIR section must include the specific information the commentator cites. Per the CEQA Guidelines, the policy consistency section is included as information (as part of the discussion of the environmental setting) to provide an initial identification of any potential project inconsistency with policies adopted to protect the environment. The City decision-makers make the final determination as to project consistency with applicable adopted policies, with consideration of the EIR and other information and analysis provided in the record, including the Staff Report, public comment, and their own deliberations. There is decision-maker judgment involved in applying this general policy to protect significant resources "wherever feasible" in a particular set of circumstances. The EIR discussion in this section reflects consideration of the more lengthy discussions in the various applicable impact analysis sections, including cultural resources and visual aesthetics and historic structures reports. The historic structures report sections cited by the commentator are consistent with and supportive of the EIR analysis that finds that the project could be found consistent with this policy.

The commentator's statement that if the project deviates from the specified setback and height limitations, it cannot be found consistent with this policy is not correct. The

analysis cited evaluated those proposed setbacks and found them to be sufficient to avoid significant effects on the historic visual character of the neighborhood. This neither establishes that those are the only setback distances that would sufficiently avoid a significant effect, nor that those are the only setback distances that the decision-makers could find consistent with historic resources protection policies. The commentator's opinions will be forwarded for decision-maker consideration.

- AA-83 **Policy Consistency: Housing Element.** The commentator is correct that four dwelling units, rather than two, would be removed as a result of the project. References within the Final EIR (Chapter 16.0) are corrected to reflect this information.
- AA-84 **Policy Consistency: Circulation Element.** Please refer to Response to Comment AA-39 regarding the project's consistency with the Circulation Element.
- AA-85 **Policy Consistency: Noise Element, Helicopter and Construction Noise.** Please refer to EIR Chapter 11.0 for analysis of project operational and construction noise effects, Topical Response to Comment 2 regarding helicopter noise, and Topical Response 3 regarding construction noise. The EIR identifies helicopter noise effects as significant and unavoidable and finds that the project could be found consistent with applicable Noise Element Policies. Please refer to Response to Comment AA-15 regarding the suggestion that residences affected by construction and operational noise be retrofitted with double-paned windows. The commentator's opinions regarding noise mitigation and project consistency with the Noise Element are noted and will be forwarded to decision-makers, who will make final determinations on mitigation feasibility and policy consistency.
- The interior noise standard is 45 dBA  $L_{dn}$ . A typical residential building would provide a 24 dBA exterior-to-interior noise reduction with windows closed. In order for interior noise impacts to occur, the exterior noise level would need to exceed 69 dBA  $L_{dn}$ . Based on Table 11.I in the Draft EIR, no nearby residences would experience noise levels reaching this level even with the assumption of two nighttime helicopter flights (60–62 dBA  $L_{dn}$ ). Similarly, construction noise would not result in noise levels at adjacent residences to exceed 69 dBA  $L_{dn}$ . Therefore, building facade upgrades, such as double-paned windows or sound barriers, would not be required. However, Mitigation Measures N-9 through N-18 would reduce potential construction noise impacts on adjacent noise-sensitive land uses.
- AA-86 **Air Quality: Existing Setting.** EtO sterilizers have abators (emission control systems) with a 99.9 percent removal efficiency so that the only measurable emissions are CO<sub>2</sub> and H<sub>2</sub>O. Please refer to Response to Comment A-2 for more information.
- AA-87 **Air Quality: Transportation Demand Management.** The comment regarding County employee alternative transportation use is noted.
- AA-88 **Air Quality: CO Hot Spot Analysis.** The EIR CO Hotspots analysis of street intersections near the hospital (shown in Table 5.F) shows that CO concentrations increase only slightly with the same traffic that will be leaving and entering the parking

structures (refer to the intersection of Junipero Street and Bath Street and the intersection of Pueblo Street and Castillo Street, typically less than 0.2 ppm). With the existing background concentrations in the vicinity of the hospital of 5.9 ppm for the one-hour standard and 2.3 ppm for the eight-hour standard, the concentrations of CO could increase up to 14 ppm for the one-hour standard and 6.7 ppm for the eight-hour standard and would still be under the more restrictive State standards. Analyses of CO hot spots from parking garages show that CO concentration increases are similar to those seen at street intersections even during periods of heavy usage (such as during shift changes). Additionally, the location of receptors for street intersection modeling is 10–16 meters from the roadway centerline, while the distance from the areas in the parking structures where cars congregate to the nearest home or other sensitive receptor is at least three times that distance. CO hot spots are a very localized phenomenon. Further analysis for CO hot spots for the parking garages is not warranted.

- AA-89     **Figure 4.2: General Plan Land Use Map.** The Land Use Map shows a “buffer” running along Los Olivos Street. The Open Space Element of the General Plan does not further define the buffer/stream designation, as it occurs in several different areas of the City.
- AA-90     **Air Quality: Suggested Mitigation.** Please refer to Response to Comment Y-6 regarding an employee shuttle between Cottage Hospital and the hospital workforce employee housing site (former St. Francis property). The project includes an employee transportation demand management program, and Mitigation Measure TRF-3 identifies a parking cash-out program to provide an added employee incentive to use alternative transportation modes. A patient shuttle is not currently provided by SBCH, and there are no plans to provide such a service in the future. A specific mitigation measure requiring the operation of a patient shuttle is not included in the project. As part of a condition of approval regarding transportation demand management, consideration could be given to hospital investigation and pursuit of a patient shuttle. The commentator’s opinions are noted and will be forwarded for decision-maker consideration.
- AA-91     **Air Quality: Diesel Toxics.** The reference used for the EIR statement on page 5-16 of the DEIR cited above is: Office of Environmental Health Hazard Assessment (OEHHA), “Health Effects of Diesel Exhaust” fact sheet, [http://www.oehha.ca.gov/public\\_info/facts/dieselfacts.html](http://www.oehha.ca.gov/public_info/facts/dieselfacts.html). Please refer to Response to Comment A-8 regarding diesel equipment mitigation. The health risk analysis of the diesel emissions is, by definition, a long-term analysis; it is an attempt to predict health risks to an individual over a lifetime of exposure—70 years by convention. The analysis is based on an “average” emission rate over that time period. While it is certain that the technologies of diesel exhaust control and diesel engine operations will change over that 70 years, the specifics cannot be predicted at this time. The analysis, therefore, is a balance between conservative and aggressive assumptions, attempting to avoid overstating the impacts but always avoiding understating them. The commentator’s opinions regarding application of diesel equipment mitigations will be forwarded for decision-maker consideration.
- AA-92     **Air Quality: Cumulative Impacts.** The EIR provides cumulative air quality analyses in Sections 5.6.5 and 5.7.5, discussing cumulative long-term and construction impacts, respectively.



- AA-93     **Air Quality: Consistency with Clean Air Plan.** Please refer to Response to Comment AA-38.
- AA-94     **Air Quality: Dust Mitigation.** The commentator's suggestion for daily street sweeping, a standard measure is added to the EIR construction dust mitigations (AQ-5).
- AA-95     **Air Quality: Construction Equipment Mitigations.** Implementation of mitigation measures applied as conditions of approval are the responsibility of the owner/project applicant and the construction contractor/construction manager. The Project Environmental Coordinator (PEC) is responsible for monitoring compliance of construction conditions and providing monitoring reports to the City.
- AA-96     **Air Quality: Combined Health Effects of Construction and Operations.** Although there may be emissions from both operations and construction on site, the impacts of emissions from operations are negligible compared to the impacts from construction. As described in the EIR and expanded on in Responses to Comments A-1a and A-2, project stationary sources do not emit toxic constituents at any level of significance. While the EIR discussion included a health risk analysis of the long-term impacts, it was a screening-level health risk analysis with very conservative assumptions, such as that all diesel particulate matter (PM) emissions were emitted from a single place and that all the PM<sub>10</sub> emissions predicted by URBEMIS modeling were diesel exhaust PM. The fact that these emissions are from natural gas combustion, landscape maintenance, fugitive sources, and diesel PM over a spread-out area makes that assumption a very conservative one. Thus the actual health risk to residents near the hospital is far less than the risk described in the EIR, which, even with these multiple conservative assumptions, is still less than significant.
- By comparison, the diesel-powered construction equipment will be located in a confined area for periods of months. Similar to the long-term impacts section, for the construction impacts section a screening-level health risk analysis was performed, again assuming that all diesel PM emissions were emitted from a single place. However, over the entire construction period, these emissions will be located in various places over the hospital grounds that are as far as 900 feet apart. Thus the actual health risk to residents near the hospital is far less than the less than significant risk described in the DEIR.
- The hospital receives from 8 to 12 deliveries on weekdays and up to 2 deliveries on Saturdays (none on Sundays). Qualitatively, the long-term average concentration of diesel exhaust particulate at any one residence from the few delivery truck passes would be minimal compared to the concentration from construction equipment. Thus, the health risk from the overall project will not be significantly different than the risk from construction alone.
- AA-97     **Biological Resources: Mission Creek Corridor.** The comment regarding the importance of Mission Creek as a wildlife corridor is acknowledged. The portion of Mission Creek that would potentially be affected by improvements associated with the proposed project is a concrete-lined drainage channel that provides a more limited

opportunity for use as a wildlife corridor than portions of the channel which remain in a more natural condition. Chapter 6.0 of the EIR has been modified to clarify Mission Creek's role as a wildlife corridor.

- AA-98 **Biological Resources: Owls.** Please refer to Response to Comment Y-10.
- AA-99 **Biological Resources: Green Space.** It is anticipated that the urbanized wildlife and avian species of the area would utilize the proposed open areas, including courtyard patios and green space areas regardless of their location interior or exterior to the new hospital structure. Both types of spaces would provide a range of plant materials (trees, shrubs, and groundcovers) that would provide foraging, roosting, and nesting habitat for a variety of animal species tolerant of human activity.
- AA-100 **Biological Resources: Tree Protection and Replacement.** Please refer to Response to Comment AA-20 regarding impacts to trees proposed to be preserved on-site. The oak tree referenced in the comment is proposed to be protected as part of the project (SBCH's Tree Disposition Plan dated February 18, 2004, revised August 2004).
- AA-101 **Tree Replacement Size.** Please refer to Response to Comment G-113 regarding container sizes of replacement trees. The EIR provides a replacement ratio of 1:1 and 15-gallon size (Mitigation Measure B-9) for all trees removed by the plan, except oaks. For oak tree replacement (B-12), the Draft EIR provides replacement ratios according to the size of the oak tree removed. Trees slated to be retained that are lost or removed during construction have a 10:1 replacement ratio. Mitigation measures for tree protection and replacement would be applied as conditions of project approval by the Planning Commission and City Council. The ABR may make recommendations to the Planning Commission and/or City Council regarding the ratios and sizes applied.
- AA-102 **Biological Resources: Tree Protection Mitigation.** Mitigation Measure B-10, which describes the manner in which existing and replacement trees would be protected during construction, was developed by LSA's staff arborist, Denise Kelly. Ms. Kelly is a Certified Arborist (#WC-1469), and based on her experience and expertise, has determined that construction activities would be avoided within six feet of the tree canopy or drip line, whichever is farthest. For cases where work is necessary within this area, the Project Arborist would monitor these activities to ensure that impacts to preserved trees are minimized on a case-by-case basis. The commentator does not provide justification supporting the 20-foot distance cited in the comment.
- Additionally, Mitigation Measure B-10 requires a 10:1 replacement of protected trees that are lost or substantially damaged during construction. The project biologist and the Project Environmental Coordinator (PEC) would be responsible for ensuring that the construction contractor complies with the mitigation measures in the EIR and clearly identifies the repercussions of noncompliance.
- AA-103 **Biological Resources: Wildlife and Plant Species Impacts.** The EIR acknowledges that replacement trees and shrubs will require time to mature to a size similar to the existing vegetation and may not result in the exact size and type of biomass removed. The

amount of time to achieve maturation differs from species to species, and it would be speculative to identify a timeframe by which replacement landscaping would grow to similar levels as today. The general timeframe for maturation of oak trees was identified in the EIR to provide the reader an idea of the length of time that this particular sensitive species requires to achieve a mature status.

Please refer to Responses to Comments AA-105 and AA-110 regarding the significance of the temporal loss of foraging and roosting habitat for wildlife and avian species.

**AA-104 Biological Resources: Use of Native Species in Replacement Landscaping.** The comment suggests that a large majority of the replacement trees be native or provide suitable wildlife and avian habitat, as well as enhance the Mission Creek Corridor. The proposed Landscape Plan includes native species as well as compatible ornamental species and has been designed to incorporate trees and plantings that will minimize allergens to hospital patients. The landscape palette would provide similar habitat values as existing vegetation for the urban-adapted wildlife of the area. The EIR identifies mitigation that would reduce wildlife and plant species impacts to less than significant levels; therefore, additional requirements, such as increasing the component of native species in the landscaping or enhancing the Mission Creek Corridor, are not necessary to reduce impacts to less than significant levels. However, decision-makers will have the discretion to determine the feasibility of additional mitigation measures in the context of further minimizing environmental effects, determining policy consistency, and/or making findings of project benefits to override significant impacts. The commentator's suggestions will be forwarded for decision-maker consideration.

**AA-105 Biological Resources: Wildlife Habitat Impacts.** Section 6.6.1 of the EIR acknowledges that there would be temporal loss of foraging habitat. As stated in Section 6.6.1, LSA biologists conducted a reconnaissance survey within the general vicinity of the project site and the Oak Park neighborhood and determined that there is adequate mature vegetation within close proximity to the project site to accommodate displaced bird and animal species during this interim period without further enhancement of these areas. Ultimately, the replacement trees on site, in conjunction with the off-site planting of oak trees, would reduce potential impacts to localized wildlife/avian habitat to less than significant levels. Several of the mitigation measures (replanting of oak trees within the Oak Park neighborhood and specialized preservation measures) suggested in the comment are mitigation measures within the EIR, and the other suggested measures are not necessary to reduce potential environmental effects. There is no nexus between project impacts and the restoration of habitat within Mission Creek, considering the limited effect of the proposed project within the concrete-lined portion of this drainage.

The commentator suggests encouragement of private planting of trees within the neighborhood to reduce potential biological effects. Currently, the City Parks and Recreation Department and Santa Barbara Beautiful, Inc., cooperatively work together to promote tree planting throughout the City. Their efforts facilitate the planting of trees on private property, as well as promoting replacement and planting of trees within City rights-of-way. No additional mitigation requirement for the proposed project is necessary. The comments are forwarded for decision-maker consideration.

- AA-106 **Biological Resources: Tree Replacement.** The commentator's recommendations regarding a preference for placement of replacement oak trees within the Oak Park neighborhood are acknowledged and will be forwarded for consideration by the decision-makers during deliberation on the proposed project. The first priority would be to plant replacement trees on-site and then within the Oak Park neighborhood. However, it is possible that additional off-site areas would be needed given the potential number of additional trees to be planted.
- AA-107 **Biological Resources: Oak Tree Impacts.** The commentator's opinion regarding impacts are noted. Ultimately, when the oak trees replaced within the Oak Park community mature, they would provide equal habitat value within the Oak Park neighborhood as currently exists, since there would be more trees planted than would be removed by the proposed project. The EIR acknowledges that there would be a temporal loss of biological habitat in the vicinity of the proposed project but that there is adequate available habitat within close proximity to accommodate species displaced as a result of tree removal. Finally, as noted in Section 6.7.1, there are three potential locations for the planting of replacement oaks.
- AA-108 **Biological Resources: Replacement Oak Mitigation.** While the commentator is correct that replacement of oaks with larger containerized plants may have a lower initial establishment success rate than acorns or small plants, this fact is accounted for in the mitigation procedures and replacement ratios identified. The replacement ratios identified are based on the City's General Plan, Vegetation Removal Ordinance, and ABR Guidelines. Proper root preparation of replacement trees can minimize the referenced problems from containerized plants. Using acorns and smaller plants for replacement of impacted oak trees to achieve a marginal advantage in initial establishment success would result in substantially less biomass in the short- to mid-term than the mitigation as proposed. The commentator's suggestion will be forwarded for decision-maker consideration.
- AA-109 **Biological Resources: Mission Creek.** Please refer to Response to Comment G-27 regarding the Specific Plan's impacts to Mission Creek.
- AA-110 **Biological Resources: Summary of Impacts.** Please refer to Response to Comment AA-105 regarding project impacts to wildlife habitat and suggested mitigation. The commentator's statement that the residual impact after mitigation would remain significant is the opinion of the commentator. The evidence and discussion presented in the EIR supports the conclusion that impacts to biological resources other than the Moreton Bay fig would be mitigated to below the level of significance. The word "unavoidable" is removed from the first sentence of Section 6.8. The comments are forwarded to the decision-makers.
- AA-111 **Biological Resources: Moreton Bay Fig.** The potentially significant and unavoidable impact to the Moreton Bay fig identified in the Biological Resources evaluation will be added to the Class I impacts section in Chapter 1.0 as well as kept in the Class II category.

- AA-112 **Historic Impacts: Parkway Drive Residences.** Refer to Responses to Comments Y-14 and AA-113.
- AA-113 **Historic Impacts: Specific Plan Setback Requirements.** Please refer to Response to Comment AA-82. The commentator states an opinion that any changes to the project design, height, or proposed setbacks would represent a significant historic impact. This is not correct. The analysis cited evaluated the proposed project design, height, and setbacks and found them to be sufficient to avoid significant effects on the historic visual character of the neighborhood. This does not establish that this is the only design, height, or setback distances that would avoid a significant effect. The commentator's opinions will be forwarded for decision-maker consideration.
- AA-114 **Geophysical: Perched Groundwater, Permanent Dewatering.** Permanent dewatering systems are located in utility or parking areas in or below the lowest floor levels of buildings. The presence of a permanent dewatering system is not evident to anyone who is not involved with its maintenance. It is not certain that dewatering is necessary at the Pueblo parking structure. Water collected by a permanent dewatering system is discharged to a storm water collection system, unless the water does not meet discharge requirements. Water is required to be tested prior to discharge. Water that does not meet discharge requirements either requires treatment prior to discharge or must be removed by other means from the site. Noise generated by the dewatering equipment would be at a lower level than noise from activities inside the parking structure because dewatering equipment would be located underground and enclosed within the parking structure. The noise impact would not be significant. A more detailed design of the permanent dewatering system would be developed with project plans by the project architect and mechanical engineer.
- AA-115 **Geophysical: Oversized Rocks, Noise Impacts.** The presence of oversized boulders in the construction area would not affect vibration levels at adjacent sensitive land uses even with the potential rock-crushing activities. Construction activities such as pile driving, demolition, and pavement breaking are activities that would potentially result in damage to adjacent properties. The geotechnical investigation for the Pueblo parking structure indicates that oversize rocks are present at that site and most likely would be encountered during basement excavations. Crushing oversize rock and reusing it on site is one common means of handling oversize rock. Alternatively, the rock may be removed from the site. The commentator's opinion is noted.
- AA-116 **Hazards: Transportation Route.** Page 9-16 notes that the existing transportation routes for hazardous materials and waste would change only with respect to the pickup and drop-off area during the construction process. Currently this area is the loading dock on Castillo Street. As a result of the closure of Castillo Street, the new pick-up and drop-off area is proposed at the loading dock on Oak Park Lane. As required by Mitigation Measure HAZ-1, the transportation route for hazardous materials and waste would be reviewed and approved by the City Fire Department prior to issuance of building permits and certificates of occupancy for the project.

- AA-117     **Hazards: Baseline.** Please refer to Response to Comment AA-13. The EIR analytic assumption is that the number of in-patients served by the proposed project over time will decrease while the number of outpatients will increase (page 9-16).
- AA-118     **Hazards: Public Security Impacts.** SBCH would utilize existing procedures for handling individuals either convicted or arrested for criminal activity. The proposed project would not change these procedures. However, responsibility for patients in the custody of the Police Department, Highway Patrol, or Prison Units are handled by the Agency that has them in custody and not the Hospital.
- AA-119     **Hazards: Public Security, Parking Garage.** The City disagrees that the EIR needs to acknowledge the existence of “an unsupervised home of recently paroled registered sexual offenders within one block of the hospital.” City and County agencies have provided information to residents of this area regarding this use in the past. Additionally, the City has a compliant process and investigative procedure that can be used by residents to voice concerns regarding this use.
- AA-120     **Hazards: Parking Lot Public Security.** The proposed parking garage would include a circuit television system (CCTV). The camera locations would be strategically located in areas throughout the parking fields to capture video scenes interconnected to a host system located in the Hospital building. CCTV would also be located in the stairs and other egress areas of the structure. Additionally, a standard condition of approval would be applied to require that the applicant consult with the City Police Department crime analyst to determine what additional safety measures should be included in the project design.
- The project would be conditioned to provide lighting per the standards in the City of Santa Barbara Standard Details 3-005.0, which requires the installation of light standards every 100 feet for commercial development and every 250 feet for residential development. The commentator’s request that additional street lighting be provided along Los Olivos between Castillo Street and Mission Creek is beyond what is required by the Municipal Code. Comments recommending that SBCH or the City fund enhanced law enforcement activities within the Oak Park area will be forwarded to decision-makers for consideration.
- AA-121     **Hazards: Aircraft Safety.** Please refer to Response to Comment Y-3.
- AA-122     **Hazards: Helipad Regulation.** Both California Department of Transportation (Caltrans) and the Federal Aviation Administration (FAA) would have jurisdiction over the hospital helicopter flights. Caltrans has approval authority for siting and use of the heliport/helipad. Once in operation, the FAA would also monitor the helicopter flights (they review Caltrans records). If any accidents occur, the FAA and the National Transportation Safety Board (NTSB) would be involved. Mitigation Measure HAZ-8 has been amended to clarify Caltrans and FAA roles.
- AA-123     **Hydrology: Pueblo Garage.** Storm water from the proposed Pueblo parking structure would discharge onto Pueblo Street and Castillo Street, mimicking the existing

conditions. There would be no net increase of storm water discharge between the existing and proposed condition for this area due to the similar impervious conditions (> 90 percent). Due to the proposed upstream closure of Castillo Street and the proposed storm drain culvert, there would be significantly less flow on both Pueblo Street and Castillo Street in the vicinity of the Pueblo parking structure. The system would not be a single storm drain system but rather a series of pipes, downspouts, and culverts into the adjacent streets. The systems would be designed to adequately convey the necessary design storms as required by the City of Santa Barbara design standards for rooftop drainage systems. Pueblo Street and Castillo Street would serve as the overland escape route in the unlikely event that the series of drainage systems reach capacity. The residences along Los Olivos Street and Parkway Drive would not be subject to increased flooding due to similar flows from the existing and proposed condition.

Also, see Response to Comment G-56.

- AA-124 **Hydrology: Project Feature 10-4, Concrete Box Storm Drain.** The County Flood Control District has reviewed the proposed project design and hydrological changes and found the design acceptable with regard to hydrological impacts. There is no net effect on the existing 100-year floodplain elevation.
- AA-125 **Hydrology: Project Feature 10-6, Landscape Design.** The accurate number is 79,184 square feet. PF 10-6 has been revised to reflect the appropriate acreage.
- AA-126 **Hydrology: Table 10.K and Figure 10.3.** The discrepancy in peak flows for Location 9 in Table 10.K of the EIR has been edited to reflect the correct peak flow identified in Figure 10-3.
- AA-127 **Hydrology: Floodplain Impacts.** The EIR conclusion that floodplain impacts would not be significant is based on technical analysis of the preliminary project design in the *Flood Report* (Penfield & Smith 2004) and the *Santa Barbara Cottage Hospital Hydrology & Water Quality Assessment* (Fusco 2004). Mitigation Measures HYD-1 and HYD-2 require verification by the City and the Federal Emergency Management Agency (FEMA) at final design and upon completion of construction, consistent with standard regulatory requirements of FEMA and the City.
- AA-128 **Hydrology: Water Quality.** The commentator's opinion will be forwarded for decision-maker consideration. As identified in the EIR and technical study, water quality measures would be incorporated to provide treatment of the initial flows of storm water runoff. As part of the treatment plan, bio-retention opportunities would be considered within the landscaping where feasible. Factors such as soil percolation rates, slope, and tree space requirements would define the applicability of bio-retention within landscaping areas under the final design. Enhancement of the Mission Creek Corridor is beyond the project boundary and has not been identified in the EIR as a required or feasible mitigation measure.
- AA-129 **Noise Impacts.** The EIR evaluated noise impacts associated with parking structure activities and helicopter operations using the City's noise impact significance guidelines,

which are 24-hour weighted averages ( $L_{dn}$ ) reflecting long-term, continuous ambient noise levels. The EIR also identified single-event maximum noise exposure levels ( $L_{max}$ ). It is not the case that this City EIR must utilize thresholds of significance similar to those used by the County of Santa Barbara. The County exterior residential noise standard is 65 dBA CNEL, while the more stringent current City standard is 60 dBA  $L_{dn}$  or CNEL. The EIR employs impact significance guidelines identified on pages 11-1 and 11-2. A significant impact may result when exposure of off-site sensitive land uses to a long-term averaged noise level increase of 3 dBA or more occurs over the corresponding existing noise levels when the existing noise levels already exceed the City's noise compatibility guidelines. The EIR also identifies helicopter noise levels experienced in real time during a flight, using the California Model Noise Control Ordinance criteria. An individual helicopter flight occurs periodically, is of short duration, and constitutes nuisance noise, not a significant impact. It is not possible to know definitively the number of helicopter flights that would in fact occur in the future. As such, based on a reasonable worst-case assumption of more than one flight per night, the EIR identifies helicopter noise impacts as significant and unavoidable (Class I). Parking structure noise is identified as adverse but not significant (Class III).

- AA-130 **Noise: Helicopter Noise Methodology.** The commentator's scoping comments were considered by the City and EIR preparers. As shown in Table 11.I and the helicopter noise impact discussion in the EIR, AAAI and LSA analyzed potential helicopter noise impacts evaluated for the nighttime hours using a reasonable worst-case scenario. AAAI analyzed one nighttime helicopter operation. LSA analyzed the potential noise impact from more than one helicopter operation in the same night.
- AA-131 **Noise: Helicopter Flight Duration.** Maximum helicopter noise levels occur when they are operating at full power, which is associated with pass-by trips. Based on the AAAI report, one helicopter pass-by trip would last up to two minutes. The two-minute time frame begins when the approaching helicopter noise level exceeds the ambient noise level and the time frame ends when the noise levels generated by the departing helicopter return to the ambient level. Therefore, the two-minute time frame would not begin where the helicopter makes its turn into the hospital from U.S. 101. Also, helicopters idling on the hospital helipad would not generate a high noise level, as they would not be operating at full power, and the line of sight to the nearby sensitive uses would be blocked by the edge of the building's roof.
- AA-132 **Noise: Residential Noise Measurements.** As shown in Table 11.C in the EIR, LSA conducted seven noise measurements in residential areas. As shown in Table 11.I in the EIR, AAAI conducted three noise measurements in residential areas.
- AA-133 **Noise: Measurement No. 4.** As indicated in the AAAI report, measurement No. 4 is located on the south end of the hospital employee parking lot west side of Castillo Street between Pueblo Street and Los Olivos Street. Noise at measurement location No. 4 represents the residences located near Castillo Street near Los Olivos Streets. Noise measurement No. M-9 conducted by LSA in Table 11.C is similar and further representative of the residences located on Parkway Drive. Noise measurement No. M-9



was taken at the cul-de-sac of Parkway Drive north of Los Olivos Street between Castillo Street and Oak Park Lane.

- AA-134 **Noise: Number of Flights.** SBCH anticipates the average number of flights over the long term at up to two flights per week, which was conservatively rounded to one flight per day. The EIR then evaluated the noise impacts of two flights per night as a reasonable worst-case assumption.
- AA-135 **Noise: Helicopter Regulations.** The commentator's opinion is noted. Current regulations do not allow local restriction of emergency medical flights.
- AA-136 **Noise: Stationary Sources.** It is not certain that dewatering is necessary at the Pueblo parking structure. If dewatering equipment is necessary for the construction of the Pueblo parking structure, the dewatering equipment would generate a noise level of 70 dBA  $L_{max}$  at a distance of 50 feet. Noise generated by the dewatering equipment would not be significant. If dewatering equipment is necessary for the long-term use of the Pueblo parking structure, noise generated by the equipment would generate a lower noise level than activities inside the parking structure because dewatering equipment would be located underground and enclosed within the parking structure.
- AA-137 **Noise: Combined Noise.** The commentator's opinion regarding impact significance is noted. The purpose the EIR section referenced is to present the Combined Noise Analysis Methodology, which explains the qualitative characterization of combined noise effects from various intermittent sources. The EIR impact analysis provided later in the document identifies long-term noise impacts associated with intermittent short-term vehicle and stationary sources as less than significant, and long-term noise associated with helicopters as significant. Temporary construction noise is identified as significant.
- AA-138 **Noise: Helicopter Impacts.** As stated in the Long-Term Helicopter Operations Impact in Section 11.6, the maximum helicopter noise level of 93.3 dBA  $L_{max}$  for monitoring location No. 4 shown in Table 11.H should not be compared to LSA's noise measurement of 49.3 dBA  $L_{eq}$  at Monitoring Location No. M-9 shown in Table 11.C because these noise levels are given in different noise scales. Noise levels in Table 11.H are expressed in  $L_{max}$ , which is an instantaneous maximum noise level during the specified duration. Noise levels in Table 11.C are expressed in  $L_{eq}$ , which is an average over a one-hour-period.

Helicopter operations at all five monitoring sites would exceed the maximum daytime noise level of 75 dBA  $L_{max}$  and nighttime noise level of 70 dBA  $L_{max}$ . The exceedence of the maximum daytime and nighttime noise level would result in community annoyance. However, significant noise impact thresholds from helicopter operations are determined by the City's noise standards, which are based on the 24-hour A-weighted average noise level,  $L_{dn}$ . The City has an exterior noise standard of 60 dBA  $L_{dn}$  for residential land uses.

As discussed on page 11-22 in the EIR, LSA analyzed the possibility of additional helicopter operations in the same night as a reasonable worst-case assumption. The EIR

concludes that a significant and unavoidable noise impact would result if there is more than one nighttime helicopter operation in the same night.

- AA-139 **Noise: Number of Flights.** Per the commentator's suggestion, the text on page 11-19 in the EIR has been revised to say:

*As estimated by SBCH, helicopter approach and departure operations would occur up to twice per week and would have a duration of approximately two minutes.*

This text revision is a clarification and it does not alter the conclusions in the DEIR.

- AA-140 **Noise: Helicopter Noise.** The EIR evaluates helicopter noise impacts against the maximum daytime and nighttime noise level suggested by the State of California Model Noise Control Ordinance and the City's noise standard in terms of the 24-hour averaged noise level,  $L_{dn}$ . Significant noise impact thresholds from helicopter operations are determined by the City's noise standards, which are based on the 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 decibels to sound levels occurring in the nighttime between 10:00 p.m. and 7:00 a.m.

This section of the EIR discusses the fact that in the event of a major emergency, SBCH would anticipate additional flights (see page 11-19). Also, as discussed in this section, nighttime helicopter operations were analyzed as worst-case scenario. The analysis evaluated noise impacts from one nighttime event (by AAI) to more than one nighttime event (by LSA). As concluded from the analysis, one nighttime helicopter event would not result in a significant noise impact based on the City's noise standard in terms of  $L_{dn}$ .

More than one helicopter event during the nighttime hours would result in a significant noise impact because helicopter noise for two events in the same night would exceed the City's 60 dBA  $L_{dn}$  noise standard. However, as discussed in Response to Comment AA-85, the interior noise standard of 45 dBA  $L_{dn}$  in residences adjacent to the hospital would not be exceeded even with the assumption of two nighttime helicopter operations, as shown in Table 11.I. No additional mitigation, such as building facade enhancement, is therefore required.

- AA-141 **Noise: Double-Paned Windows Mitigation.** Helicopter noise effects are identified as significant to surrounding residential uses based on increases in average day/night noise levels. However, interior noise levels at residences would remain below the 45 dBA standard. Helicopter flights would be discernible to a large number of residences. The EIR does not identify retrofitting of residential windows as a feasible mitigation measure. Decision-makers will make final determinations on mitigation feasibility. The commentator's suggestion that the City and SBCH partner to fund this mitigation is forwarded to decision-makers.

- AA-142 **Noise: Table 11.H, Helicopter Noise Measurements.** Based on Table 11.I and Figure 11.2 provided by AAI, lower noise levels at noise measurement location No. 4 could be the result of the wind from the west or different helicopter power settings.

- AA-143 **Noise: Pueblo Parking Garage.** The City has an exterior noise guideline of 60 dBA  $L_{dn}$  and an interior noise standard of 45 dBA  $L_{dn}$  for residential uses. Parking structure noise was evaluated against the maximum daytime and nighttime noise levels of the State of California Model Noise Control Ordinance. Residences near the Knapp and Pueblo parking structure would potentially experience a periodic noise with a maximum nighttime noise level exceeding 70 dBA  $L_{max}$ . The exceedence of the nighttime maximum noise level of the State of California Model Noise Control Ordinance would result in a community annoyance, an adverse but not significant nuisance noise effect. As discussed on pages 11-23 and 11-34 in the EIR, the nearest residences would be exposed to an exterior noise level of 52 dBA  $L_{dn}$  from activities inside a parking structure. This noise level does not exceed the City's exterior noise standard of 60  $L_{dn}$  for residential land uses. As discussed in Response to Comment AA-140, significant noise impact thresholds are determined by the City's land use compatibility guidelines, which are based on the 24-hour A-weighted average noise level,  $L_{dn}$ . Noise generated by activities inside a parking structure would have an adverse but not significant noise impact on nearby residences in an urban area.

According to the U.S. EPA, Protective Noise Levels, Condensed Version of EPA Levels Document (1978), standard construction in warm climates would provide an exterior-to-interior noise level reduction of 24 dBA with windows closed and 12 dBA with windows open. This attenuation factor is a reasonable assumption for noise analysis and is applicable in this environment.

The interior noise level attributable to parking structure activities would be reduced to 63 dBA  $L_{max}$  with windows open and 51 dBA  $L_{max}$  with windows closed. Therefore, intermittent maximum noise levels generated by activities in a parking structure would not result in a significant and unavoidable noise impact. In addition, the maximum noise levels generated from parking structures are intermittent and would not exceed the interior noise standard of 45 dBA  $L_{dn}$  with windows closed. Mitigation measures suggested by the commentator, such as double-paned windows, closing the top levels, and implementing programs, such as prohibiting car alarms or recording license plates are not required to reduce these impacts to less than significant levels. Installation of double-paned windows is not identified as a feasible mitigation in the EIR. The car alarm measures would appear problematic from a practical standpoint of implementation and enforcement.

- AA-144 **Noise: Pueblo Parking, Mechanical Ventilation.** It is not anticipated that the Pueblo and Knapp parking structure would require mechanical ventilation, as they would only have one floor below grade. Typically, natural ventilation would be used to provide air circulation and prevent the accumulation of carbon monoxide for parking structures with only one level below grade. However, should any form of ventilation system be required for the parking structure, the noise level generated would be lower than noise from parking structure activities, such as car alarms, tire squeals, car door slams, and vehicle start-ups.
- AA-145 **Noise: Sensitive Receptor No. 6.** Page 11-33 of the EIR states that Receptor R-6 would experience an appreciable increase in noise from the combined intermittent noise sources,

including helipad operations, the parking structure, and the loading zone. The EIR does not conclude that this increase in noise constitutes a significant impact based on the City's impact significance guidelines. Noise generated on the proposed child day care facilities center would also be less than significant, as discussed on page 11-33. The commentator's opinion about noise significance and suggestion that the day care facility not use the outdoor areas before 7:30 a.m. are noted and forwarded to decision-makers.

- AA-146 **Noise: Long-Term Impacts.** "Continued" has been corrected in the FEIR to "Combined" in the subsection heading, as noted in the comment. The Long-Term Combined Noise Level in Section 11.6 addresses the combined noise effects of the various sources at sensitive receptor locations around the project site. The combined noise environment for each receptor location is different because noise levels and intervening structures that provide noise attenuation will vary at each location. The Long-Term Combined Noise Level section does not use the  $L_{dn}$ /CNEL (24-hour A-weighted noise level) or maximum noise levels to assess the noise impact at each receptor location. Instead, this section qualitatively characterizes the potential noise impact at each receptor location. An appreciable increase in the combined noise level from all sources does not represent that the proposed project would contribute to a discernable noise level increase at a particular location. The combined noise level discussion was not intended to provide the significance of noise impacts, but to provide a qualitative summary of the noise environment.
- AA-147 **Noise: Long-Term Mitigation.** Mitigation Measure N-3 states that a detailed helicopter operation record regarding the type of trip and the time of arrival and departure shall be provided by SBCH to the Community Development Department annually. This provision shall be incorporated into the Helicopter Operation Plan. If the proposed annual helicopter operations other than emergencies increase by 50 trips, the City shall reevaluate the hospital's helicopter operation and allow the Planning Commission to consider other alternatives. The mitigation measures in the EIR differ from the prior Planning Commission approval because City Staff has learned more about limitations for restricting emergency flights.
- AA-148 **Noise: Long-Term Mitigation.** EIR Mitigation Measures N-1 through N-3 would provide for a helicopter operations plan, which could address helicopter technology, flight practices, prohibition of nonemergency night flights, identification of a contact person for reporting violations of flight paths, and monitoring of helicopter flight activity. Ambulance routes cannot be designated to avoid residential areas. Use of sirens is based on vehicle public safety considerations. Installation of double-paned windows is not identified in the EIR as a feasible mitigation. Child care center noise is identified as less than significant, but the commentator's recommended measure that outdoor play at the facility would not occur before 7:30 a.m. could be considered by decision-makers to minimize adverse but not significant effects and enhance neighborhood compatibility.
- AA-149 **Noise: SP/CUP Finding.** The comment is noted and will be forwarded to the decision-makers.

- AA-150 **Noise: Cumulative Noise Impacts.** These comments are acknowledged regarding cumulative noise impacts increasing over time. This information does not alter the cumulative analysis in the EIR.
- AA-151 **Noise: Pueblo Parking Construction.** Noise contour lines are feasible for steady noise levels, such as those associated with vehicular traffic. Intermittent and fluctuating maximum noise levels ( $L_{max}$ ) from construction activities are not suitable for contour line mapping.
- AA-152 **Noise: Construction Noise Mitigation.** Comments acknowledged. EIR construction noise mitigation measures include provisions for temporary noise barriers; limitations on construction hours, construction monitor, and contact person; construction notification to neighbors; and limitations on construction worker noise and construction vehicle noise. Standard City conditions to be recommended would provide for preconstruction meetings, periodic meetings with neighbors, a Project Mitigation Monitor with stop work authority, and staff authority to modify mitigation measures in substantial conformance with conditions. The commentator's suggestions for relocation of staging areas may not be feasible. Mitigation measures deemed feasible by the decision-makers will be applied to the project.
- AA-153 **Construction Vibration.** The presence of an oversized boulder in the construction area would not affect vibration levels at adjacent sensitive land uses even with the potential rock-crushing activities. Construction activities such as pile driving, demolition, and pavement breaking are activities that would potentially result in damage to adjacent properties. Mitigation Measure N-8 provides for a pre-construction crack survey. As discussed in Response to Comment G-79, the measure has been refined consistent with Figures 11.4 through 11.6, as follows:
- Prior to issuance of demolition permits, SBCH or its designee shall prepare crack survey and video reconnaissance documenting the existing condition of the hospital structure that would remain and neighboring structures that are within 150 feet of the project site and are over 20 years old prior to project construction. After each major phase of construction, as identified in the EIR, pages 3-20 through 3-24 and Figure 3.10, a follow-up crack survey and video reconnaissance of neighboring structures shall be conducted to determine whether any new cracks or other damage have occurred. The City and SBCH shall review the results of both pre- and postconstruction surveys to determine whether any new damage resulted from project construction activities. SBCH would be responsible for the cost of damage to structures due to project construction. Figures 11.4 through 11.6 show the potential areas that would require a crack survey and video reconnaissance documentation.*
- AA-154 Please refer to Responses to Comments AA-153 and G-79. The mitigation measure has been revised to indicate damage responsibilities and to change the distance of the survey to 150 feet.

- AA-155     **Noise: Cumulative Construction Noise.** As noted in the EIR discussion of cumulative noise effects, construction noise is localized around a site, and no additional significant cumulative noise effects from multiple projects are identified.
- AA-156     **Noise: Vibration Crack Survey.** Please refer to Response to Comment G-79 and AA-153. LSA's acoustical engineer has determined that 150 feet is the more appropriate distance for the crack surveys and reconnaissance based on Figures 11.4 through 11.6 of the EIR. These figures are correct, and the text of the EIR has been revised to be consistent.
- AA-157     **Transportation: Parking Impact Threshold.** Chapter 28.90.100.J.9 of the Zoning Ordinance states that "at least one space shall be provided for each bed..."; however, the EIR determined that the Zoning Ordinance requirement would not meet the parking demand for the Cottage Hospital project. There are 337 beds proposed, and if the project only met the requirements of the zoning ordinance, SBCH would only be required to provide 337 spaces. That is approximately 38 percent of the existing off-street parking supply, and the studies show that the existing lots are on average used at 93 percent of capacity. If the project is not required to provide for the parking demand, a parking impact to the adjacent neighborhood streets would result.
- AA-158     **Transportation.** Please refer to Response to Comment AA-39 regarding project consistency with the City Circulation Element.
- AA-159     **Transportation: Existing Parking Setting.** The reference that the SBCH lots serve only hospital users differentiates the off-street spaces from the on-street spaces. The study assumes that the parked vehicles within the SBCH facilities are hospital users, a reasonable worst-case assumption based on reasonably available information. A ratio between on-street and off-street parking spaces was identified to account for the total parking demand for SBCH.
- AA-160     **Transportation: Neighborhood Traffic Management Program.** City staff generally agrees with the commentator's statement. The identified Parking Cash-Out Program (Mitigation Measure TRF-3) intends to address these concerns and provide a means to an efficient parking program that does not necessarily provide parking without an expense. The parking cash-out program would be a cash incentive for employees to use alternative transportation.
- AA-161     **Transportation: Baseline.** Licensed beds are not accounted for in the traffic analysis, relative to existing and future trip generation or parking demand. Refer to Topical Response 1 (Trip Generation) and Chapter 13.0 of the EIR for discussion of the parking demand method.
- AA-162     **Transportation: Parking Surveys.** The survey sample size was 10 percent for the first day and 7 percent for the second day. The surveys were used to develop a profile of the travel and parking characteristics of staff, patients, visitors, and others who travel to and from the hospital. The questions in the survey covered the information relative to travel mode, auto occupancy, parking location, arrival and destination times, and travel origins,

as well as purpose for the trip, and were appropriate for the ways in which they were used in the analysis. Staff believes the sample sizes were adequate, and the survey information was effective to determine trip generation and parking demand calculations.

- AA-163 **Transportation: Parking Deficit.** Please refer to Topical Response 6 regarding revision to the parking analysis. The intent of this CEQA document is to provide the most accurate identification of baseline conditions and future project impacts, regardless of past conditions or analyses. The City methodology is more customized to the project and circumstances than the other parking criteria referenced. The commentator's opinion regarding overparking of the project is noted.
- AA-164 **Transportation: Cumulative Projects.** The cumulative project list includes all pending and approved projects, as well as those for which building permits were issued in the area surrounding Cottage Hospital. The list was given to the consultant prior to commencement of the DEIR preparation. Any projects that were not part of the system at that time were not considered in the cumulative analysis. The condominium projects referenced in the commentator's letter are not identified with an address; however, it is not likely that they would generate more than 10 peak hour trips. The projects that did not generate 10 peak hour trips were included in a general 1 percent growth rate.
- AA-165 **Transportation: Improve Neighborhood Circulation.** The recommended conditions of approval for the abandonment of Castillo Street will include the measures identified in the Recommended Mitigations for Castillo Abandonment section of the EIR. The improvements would provide pedestrian enhancements throughout the neighborhood, including but not limited to curb extensions, sidewalk improvements, curb ramps, and the undergrounding of utility lines. Cottage Hospital would be financially responsible for these improvements.
- AA-166 **Transportation: Neighborhood Street Analysis.** The Appleyard Study (1970) was only used as a reference for the methodology of determining the change in livability on neighborhood streets. The Appleyard study provided good parameters to quantify the traffic volume increase relative to livability for each street segment on the adjacent street network. The existing, cumulative, and project traffic (average daily trips [ADT]) were used in the street analysis. The data in the analysis was current and specific to the Cottage Hospital project. City staff believes that the Appleyard methodology is an accurate way to characterize impacts to livability, and the age of the study is irrelevant, considering the data is current.
- AA-167 **Transportation: Parking Impacts.** Please refer to Response to Comment AA-162 regarding the parking survey sample size. The parking utilization factors show that doctors have a 100 percent drive-alone rate. Therefore, as a reasonable worse-case, they have been included in the parking demand at a 100 percent rate.
- AA-168 **Transportation: Existing Parking Supply.** The parking supply number accurately represents the parking facilities available at all the SBCH parking lots in the Specific Plan area. Regarding the comment about overlapping shifts, the traffic and parking analyses conducted for the EIR were based in part on information from the Kaku Traffic Study

(Appendix J) referenced in the EIR, Chapter 13.0, from the information gathered in its surveys of hospital staff and visitors, existing traffic counts (which inherently account for the effects from staff shifts), as well as tailored methods for determining project trip generation and parking demand. Refer to Topical Responses 1 and 6.

- AA-169 **Transportation.** For the purposes of the analysis in the EIR, it was assumed that the SBCH facilities were used by hospital users as a reasonable worst-case assumption. SBCH has the ability to monitor this at any time. Staff is not aware of any significant use of these facilities by nonhospital users that would materially change the parking demand analysis.
- AA-170 **Transportation: Existing Parking Utilization.** The comments are acknowledged. It is the intent of the EIR to disclose the existing baseline conditions and analyze potential future impacts. The SBCH parking utilization numbers are not ideal, and are higher than the County and City average; however, the data cannot be skewed to create a more heartening model. It is also noted that hospital employees have some specialized characteristics with respect to work hours and the need for some to be immediately available for emergencies. However, there are proposed project features and mitigation measures that would potentially improve the use of alternative transportation. Some of these measures include the continuation and promotion of the existing transportation demand management (TDM) program that includes vanpool subsidies, discounts on bus passes, carpool incentives, as well as the parking cash-out program, a bicycle facility in the Pueblo parking structure (including showers and lockers), and pedestrian enhancements surrounding the hospital.
- AA-171 **Transportation: Parking and Alternative Transportation.** Please refer to Response to Comment AA-170 for a list of transportation demand management (TDM) measures that would encourage local employees to use alternative transportation.
- AA-172 **Transportation: Parking Deficit.** Please refer to Response to Comment AA-163.
- AA-173 **Transportation: Parking Demand.** Please refer to Response to Comment AA-163. The information contained within the EIR is a project-specific analysis using survey data, traffic counts, and operational information. The Institute of Traffic Engineers (ITE) provides a reference based on surveys of other hospitals in the nation. Staff uses ITE rates when actual data is not available or not necessary to determine an appropriate parking demand rate. Staff determined that using actual data for the SBCH EIR is the most accurate means of determining the parking demand for the proposed project.
- AA-174 **Transportation: Parking Demand.** Please refer to Topical Response 6 regarding revised parking analysis. The Outpatient Surgery Center and the Fletcher Building are not included in the project site; however, parking associated with the Fletcher Building is included as part of the project parking supply. Refer to Response to Comment AA-56 regarding allocation of existing parking spaces.
- AA-175 **Transportation: Parking Mitigation.** Please refer to Topical Response 6. The revised parking analysis demonstrates that the project as proposed would provide sufficient



parking to meet its projected demand, and Mitigation Measure TRF-4, Additional Parking Spaces, has been deleted from the Final EIR.

- AA-176 **Transportation: Residential Parking Permit Program.** Comment noted and forwarded for decision-maker consideration. The City has an existing program that allows neighborhoods to propose consideration of a residential parking permit program. A residential parking permit program may also be considered by the decision-makers for inclusion in this project.
- AA-177 **Transportation: On-Street Parking.** The parking demand analysis for the project recognizes that a portion of hospital patrons currently use on-street parking and assumes that a percentage of hospital users will continue to park on the street with the reconstructed hospital. Extension of the parking time limit restriction to two hours could be considered.
- AA-178 **Transportation: Construction Parking Mitigation.** The commentator's opinion will be forwarded for decision-maker consideration.
- AA-179 **Transportation: Figure 13.1, Existing Setting.** The figure has been corrected to remove the handicapped ramp at the northwest corner of Los Olivos/Castillo Street intersection. Consistent with City provisions for implementation of American Disability Act requirements, installation of handicap ramps at selected intersections surrounding the hospital will be recommended as a condition of the abandonment of Castillo Street.
- AA-180 **Transportation: Figure 13.2B.** The commentator is correct that the location of the child care facility is not accurately shown on Figure 13.2B. The correct location is mid-block on Pueblo Street. The Outpatient Surgery parking is not shown, as it is not part of the project and would not be included as an off-site parking location.
- AA-181 **Transportation: Figure 13.18.** This figure has been updated to include the surface parking lots proposed by the project.
- AA-182 **Visual: Consistency with Urban Design Guidelines 8.2.1.** The referenced design guideline identifies placement of parking structures underground as one technique for minimizing visual effects on the streetscape. The project considered a design for placing parking underground (see EIR alternatives analysis). The initial EIR policy analysis does not find the project inconsistent with the guideline. The commentator's opinion is forwarded for decision-maker consideration.
- AA-183 **Visual: Existing Setting, Views.** Reference to existing mountain views from project area streets and individual residences has been added to the discussion in the EIR.
- AA-184 **Visual: Existing Setting, Land Use/Architecture.** The commentator's comment regarding the age and architecture of the residences along Parkway Drive is noted. This information is a clarification and does not alter the conclusions in the EIR. This comment is consistent with the information contained in Section 7, Effects of Proposed Changes on other Historic Properties or Historic Visual Character of the Neighborhood, in the *Letter*

*Addendum to Historic Structures Report for the Cottage Hospital Master Plan prepared by San Buena Vista Research Associates (October 2003).*

- AA-185 **Visual: Private View Impacts.** The EIR evaluates public and private view impacts appropriately in accordance with CEQA, recent case law, and City practice. The EIR Visual Aesthetics analysis and City impact significance guidelines address whether the project obstructs important public scenic views, results in a substantial negative aesthetic effect or incompatibility with surrounding land uses or structures due to design features, or results in substantial lighting impacts. The analysis of visual aesthetics and compatibility includes consideration of private views as applicable.

In its findings for *Ocean View Estates v. Montecito Water District*, the Second District Appeal Court found that State law does not prohibit assessment of potential impacts to private views, nor does the law require this assessment. The findings of this case upheld the longstanding case law that requires evaluation of impacts to public views (in that case from public trails).

In a similar recent case, *Bowman v. City of Berkeley*, the First District Appeal Court found that neighborhood concerns regarding the scale of a proposed development did not necessarily result in significant visual impacts to private views given that the subject building is in a developed area, would not obstruct scenic views, and would be subject to City design review.

- AA-186 **Visual: Long-Term Impacts.** Please refer to Response to Comment AA-19 regarding the EIR's conclusions on the significance of the proposed project's visual impacts. The visual analysis (including the visual simulations) in Chapter 14.0 of the EIR acknowledges and assesses the increased size of the replacement facility, the loss of existing trees and other vegetation, and the change in lighting. Based on this assessment, the EIR finds the visual impacts to the character of the Oak Park community from the proposed project to be less than significant. The commentator's opinion on visual impact significance will be forwarded to the decision-makers for their consideration. Please refer to Response to Comment AA-21 regarding undergrounding of utilities and Responses to Comments AA-23, AA-25, and AA-26 regarding the significance of visual impacts within the Oak Park neighborhood.

The need for the suggested lighting mitigation measure (elimination of lighting on the top level of the parking garage to reduce potentially significant lighting effects) is not substantiated by the conclusions of the lighting analysis conducted in the EIR. The suggested mitigation measure will be forwarded to the decision-makers for their consideration.

- AA-187 **Visual: Simulations.** For purposes of the EIR analysis, the visual simulations were prepared utilizing conceptual project plans. These plans included building layout, architectural design and treatment, landscape design, and disposition of existing trees. The visual simulations provide a graphic representation of the information provided in conceptual plans for use by the public and decision-makers in understanding the proposed project's potential visual effects. The buildings, architectural treatments, and hardscape

features are based on architectural drawings and were modeled using 3D computer technology.

Application of the landscape concept is more interpretive. As described in Section 14.2 of the EIR, the landscape concept is approximate and demonstrates the look and feel of vegetation growth after five years and at mature vegetation growth, based on the April 2004 landscape plans provided by the project applicant. Illustrative representation of the growth in landscaping was derived by review of photographs of the proposed plant/landscape materials, evaluation of the scale of the existing vegetation within the project site for use as a comparative metric for estimating future mature growth patterns, and consideration of the scale of the proposed structures. The standard for CEQA review assumptions is not the worst-case scenario, but a reasonable worst-case scenario. Actual future levels of landscape maturation could vary somewhat depending on a variety of factors, such as long-term maintenance practices; however, the simulations represent a reasonable worst case analysis. The commentator's opinion will be forwarded to the decision-makers for their consideration. Please refer to Response to Comment AA-20 regarding the loss of protected or replacement trees during construction and establishment.

**AA-188 Visual: View 9, Public Scenic View Impacts.** The commentator's remarks regarding the public's enjoyment of the Parkway Drive residences is acknowledged and will be forwarded to the decision-makers. Two viewing locations on Los Olivos Street were assessed in the visual impact analysis conducted for the DEIR. View 5 depicts the potential visual effects from the proposed project at the Los Olivos Street/Castillo Street intersection. View 9 depicts the potential visual effects of the proposed project at the Los Olivos Street/Parkway Drive intersection. Both of these intersections are located within the area noted by the commentator and provide a representation of public views within this designated buffer area. As described in Chapter 14.0, the EIR analysis finds potential impacts to public views from these locations to be less than significant.

The General Plan Land Use and Open Space Elements do not further define the buffer areas as important view locations. There is specific discussion of U.S. 101 and to some degree, creek areas; however, the buffer designation that occurs throughout the City can have a different meaning, such as a transition area between land uses.

**AA-189 Visual: View 9, Aesthetics/Compatibility Impacts.** The comments are acknowledged and will be forwarded to the decision-makers for consideration. The Specific Plan proposes a height limit of 45 feet in Land Use Area C and a minimum setback of 10 feet. The project proposes a substantially greater setback from the garage to residences, and project approval would reflect that setback. Any future development will require environmental review and review for design and compatibility with surrounding land uses as part of the Architectural Board of Review and Planning Commission review and consideration for approval.

**AA-190 Visual: Aesthetics/Compatibility Impacts.** The commentator's opinion is noted and forwarded to decision-makers. Please refer to Response to Comment AA-19.

- AA-191 **Visual: Lighting Impacts.** The ambient light levels at the adjacent residences would be reduced because the proposed project does not include landscape lighting features at the child care facility, and the design of the parking structures incorporates solid walls in the vicinity of the homes that will block the security lighting associated with the structure both from within and on top.
- AA-192 **Visual: Lighting.** As described in the text of the EIR, there would be increased lighting compared to existing low lighting conditions; however, this change would not result in excessive lighting levels or glare impacts. Lighting would not be any greater than normal levels that are permitted within other urban residential neighborhoods throughout the City, consistent with the City's lighting ordinance. Potential spillover effects would be avoided through the use of shields on fixtures to direct lighting away from residences. The impact is not significant.
- AA-193 **Visual: Mitigation.** Please refer to Response to Comment AA-186 regarding the significance of the proposed project's visual impacts and the mitigation measures suggested by the commentator. It is also noted that the project is subject to the City of Santa Barbara's extensive design review process, which will address further refinements to visual aesthetics, compatibility, and lighting issues.
- AA-194 **Visual: Cumulative Impacts.** Please refer to Responses to Comments AA-24 and AA-25.
- AA-195 **Visual: Sandstone Curbs and Walls.** The Applicant would be required to replace any existing sandstone curb with new sandstone curb. The City does not have policies/requirements to install sandstone curbs unless required by the Architectural Board of Review.
- AA-196 **Visual: Simulation 14.11a, Pueblo Parking Architecture.** The wall treatment presented in the visual simulations is based on the project conceptual design plans submitted by the applicant (April 2004). The project conceptual design has since been undergoing refinement through review and input by the Architectural Board of Review (ABR), such as additional landscaping, refined architectural design, and lighting, intended to improve the visual quality of the parking structure. These refinements are improvements to overall project design and do not affect the conclusions of the EIR.
- AA-197 **Visual: Simulation 14.11.a, Child Care Facility Fencing.** The fencing depicted in the visual simulation is based on the project conceptual design plans (April 2004), which have been refined during subsequent review by the ABR to improve the visual quality of the day care facility. As described in the applicant's EIR comment letter (Comment G-103), the current project design proposes a low picket fence around the day care facility of approximately 42 inches in height with style appropriate for the Craftsman buildings. This refinement is an improvement to the overall project design and does not affect the conclusions of the EIR.
- AA-198 **Visual: Simulation Figure 14.11.a.** The location of the building associated with the child care center, depicted in Figure 14.11a, is consistent with the project conceptual

design plans (April, 2004). As shown on page A30 of the application submittal package, the preschool building is offset slightly west of the toddler/infant complex, as depicted in Figure 14.11a of the EIR.

**AA-199 Alternatives: Alternative 3D, Reduced Parking Structure Size.** The commentator's general opinion regarding the evaluation of off-site alternatives, and support for Alternative 3D, Reduced Parking Structure Size, is acknowledged and will be forwarded to the decision-makers for their consideration. Please refer to Responses to Comments AA-170 and AA-175 regarding TDM programs and Response to Comment Y-6 regarding a suggested vanpool between the St. Francis housing proposal site and SBCH. The trip generation for the proposed project has already taken into account the TDM program currently implemented by SBCH (based on the existing traffic counts, which reflect any TDM program components). It is not clear that measures to aggressively encourage more alternative transportation use would in fact reduce vehicle trips and potential parking demand to within the number of parking spaces proposed in Alternative 3.D. Note that California Health and Safety Code provisions (40717.9) limit the ability of public agencies to require employee trip reduction programs such that no performance standards for level of participation or trip reduction would be required, and trip reduction credit cannot be applied in evaluating residual impact significance. As such, it is not clear that the alternative would realize the traffic, noise, and air quality impact reductions.

**AA-200 Alternatives: Alternative 3E, Underground Parking.** The commentator's statement regarding Alternative 3E's reduction in comparative visual, noise, and land use compatibility/public security impacts is acknowledged. Construction of an underground parking structure has the perceived potential to result in increased malicious attacks, as noted by the commentator.

With underground parking as identified in Alternative 3E, a slightly greater potential exists for collection of carbon monoxide from vehicles ingressing, egressing, and idling within the parking structure. Elevated levels of carbon monoxide within the enclosed subterranean structure could pose a health risk and would require ventilation. The potential for elevated levels of carbon monoxide within the subterranean level of the Pueblo parking structure is not significant because there is only a limited area that is placed underground, and the design of the structure provides openings for air circulation that will limit the collection of carbon monoxide gases.

Both the Pueblo parking structure and a parking structure under the hospital would require temporary and permanent dewatering systems. Due to the depth of a parking structure under the hospital (approximately 28–35 feet below existing site grade) compared to the Pueblo parking structure (approximately 10 feet below existing site grade), there would potentially be substantially greater amounts of water that would need to be pumped away from the foundation and walls of the underground structure. As a result of the additional dewatering, the potential would exist for encountering perched water that is contaminated and would require special treatment after it is pumped away from the structure. Considering the increased amount and potential quality of water pumped away from the structure, potential hydrology and water quality impacts are greater for Alternative 3E.

As described in the EIR, an underground structure would require a longer construction schedule than estimated for the current project, resulting in greater noise and vibration impacts within the Oak Park community. There is the potential for residences to the south and southeast of the Pueblo Structure to experience comparatively lower construction noise levels due to the reduction in construction activity adjacent to them; however, they would experience construction noise conditions for a longer period of time.

The underground structure would require permanent ventilation of the parking structure to reduce carbon monoxide levels. This 24-hour system would require mechanical equipment to operate and has the potential to increase noise levels adjacent to the equipment, if not properly attenuated through baffling.

Please refer to Response to Comment AA-199 regarding the effect of an aggressive transportation demand management (TDM) program on parking demand.

The commentator's suggestion that the area of the proposed Pueblo parking garage be used for workforce housing is acknowledged and will be forwarded for consideration by the decision-makers.

- AA-201     **Alternatives: Alternative 3F, Alternative Pueblo Parking Location.** The EIR identified this alternative as having similar or slightly greater environmental impacts compared to the current project. The commentator's opinions are noted.
- AA-202     **Alternatives: Alternative 4B, Goleta Valley Hospital.** The EIR analysis appropriately identifies the existing site size and zoning as a potential constraint compared to the project. Unlike the Cottage Hospital site that has received preliminary review by the City Council and Planning Commission regarding change to the zoning, it is unknown whether a zone change allowing a height increase would be approvable by the City of Goleta, and it is speculative to presume so. In addition, the site is located close to the Santa Barbara Airport, which may also present a height constraint. Other comments reflecting impacts compared to the project and support for this alternative are noted.
- AA-203     **Alternatives: Alternative 4C.3, Earl Warren Showgrounds.** At the time of the DEIR preparation, available information from Cottage Hospital and the State was that the State had no intention to sell the property, and the EIR analysis therefore reflects this as a constraint. Site ownership and the cost to purchase remain a constraint compared to the project site, which is already owned by Cottage Hospital. Text has been added to the EIR to indicate that the State may be considering the potential sale of this property; however, that cannot be confirmed at this time.
- AA-204     **Alternatives: Alternative 3D, Reduced Parking Structure Site.** The commentator is correct that implementation of Alternative 3D would result in more parking spaces than currently exist. However, the parking supply would be less than what is needed to accommodate the proposed project. The EIR text has been revised for specific

alternatives in Chapter 15.0 to reflect the revised conclusion about project parking supply now being adequate (see Topical Response 6).

The commentator's suggestion to reduce available parking and implement a transportation demand management (TDM) program to reduce traffic and air quality impacts is acknowledged. The City is supportive of TDM programs; however, implementation of an aggressive TDM program may not be a feasible means of reducing traffic trips. Please refer to Response to Comment AA-199.

- AA-205 **Alternatives: Alternative 3E, Underground Parking Alternative.** Please refer to Response to Comment AA-200 regarding impacts associated with the underground parking structure. Regarding the traffic and circulation impacts of this alternative, there would be a decreased supply in parking compared to the proposed project, and the parking demand for the proposed project would not be met. This unmet demand would result in greater parking impacts than the proposed project.

Additionally, Alternative 3E would concentrate more of the vehicle trips to one point of access on Pueblo Street, resulting in more localized congestion at this ingress/egress point. The proposed Pueblo parking structure has two access points, one on Pueblo Street and one on Castillo Street, which allow for a better distribution of vehicle trips to the local arterial network.

- AA-206 **Growth Inducement.** The commentator's opinions are noted and forwarded to decision-makers. The City General Plan Land Use Element has designated the Cottage Hospital area for hospital and medical office uses for decades. Santa Barbara Cottage Hospital has been long-established in this location as the primary hospital for the region, as have medical office and hospital support uses already in place in the surrounding area. The St. Francis Medical Center already closed before the SBCH project proceeded for review, and resulting adjustments to the location of medical office space were triggered by that closure, not the SBCH project. The Goleta Valley Hospital has announced its intention to proceed with seismic upgrades in its present location, and a presumption of its closure would be speculative. The SBCH project would provide for the hospital to remain in its current location, and the concentration of medical office uses would be expected to continue in the surrounding area. The project would convert some space currently in medical office use to hospital use, thereby constraining the amount of remaining area designated for medical office use. Given the incentive for medical office and hospital support uses to locate close to the hospital for convenience, this could result in pressure to either expand or intensify the existing medical office use area surrounding the hospital. Alternatively, with upward pressure on rents in the area, medical office uses may choose to locate elsewhere, as have the SBCH administrative functions (which moved to Goleta) and other medical office uses that have located in other parts of the City, including De La Vina Street, Milpas Street, and State Street.

- AA-207 **Summary of Suggested Mitigation Measures.** The commentator's list of key mitigation measures are noted. Please refer to prior responses to these same comments.

- AA-208     **Summary Comment.** It is noted that the commentator expresses the opinion that the proposed hospital reconstruction will be welcome if the neighbors feel that everything possible is being done to mitigate the significant impacts they will experience during construction and long-term operation of the proposed project. The Final EIR includes many mitigation measures and project features in order to protect the environment and the public's health, particularly in neighborhoods surrounding the hospital.